TSD File Inventory Index

Date *February 11, 2005*

Initial *C Mhserewa*

Facility Name *E. Thomas Wald (One folder/Site)*

Facility Identification Number *ILD 006 806 190*

A.1 General Correspondence		**B.2 Permit Docket (B.1.2)**	
A.2 Part A / Interim Status		1 Correspondence	
1 Correspondence	Y	2 All Other Permitting Documents (Not Part of the ARA)	
2 Notification and Acknowledgment	X	**C.1 Compliance - (Inspection Reports)**	X
3 Part A Application and Amendments	X	**C.2 Compliance/Enforcement**	X
4 Financial Insurance (Sudden, Non Sudden)		1 Land Disposal Restriction Notifications	
5 Change Under Interim Status Requests		2 Import/Export Notifications	
6 Annual and Biennial Reports		**C.3 FOIA Exemptions - Non-Releasable Documents**	
A.3 Groundwater Monitoring		**D.1 Corrective Action/Facility Assessment**	
1 Correspondence		1 RFA Correspondence	X
2 Reports		2 Background Reports, Supporting Docs and Studies	
A.4 Closure/Post Closure		3 State Prelim Investigation Memos	
1 Correspondence	X	4 RFA Reports	X
2 Closure/Post Closure Plans Certificates etc	X	**D. 2 Corrective Action/Facility Investigation**	
A.5 Ambient Air Monitoring		1 RFI Correspondence	
1 Correspondence		2 RFI Workplan	
2 Reports		3 RFI Program Reports and Oversight	
B 1 Administrative Record		4 RFI Draft /Final Report	

Total - 1

5 RFI QAPP		7 Lab data Soil Sampling/Groundwater	
6 RFI QAPP Correspondence		8 Progress Reports	
7 Lab Data. Soil-Sampling/Groundwater		**D.5 Corrective Action/Enforcement**	
8 RFI Progress Reports		1 Administrative Record 3008(h) Order	
9 Interim Measures Correspondence		2 Other Non-AR Documents	
10 Interim Measures Workplan and Reports		**D.6 Environmental Indicator Determinations**	
D.3 Corrective Action/Remediation Study		1 Forms/Checklists	
1 CMS Correspondence		**E. Boilers and Industrial Furnaces (BIF)**	
.2 Interim Measures		1 Correspondence	
.3 CMS Workplan		.2 Reports	
4 CMS Draft/Final Report		**F Imagery/Special Studies** (Videos, photos, disks, maps, blueprints, drawings, and other special materials.)	X
.5 Stabilization		**G.1 Risk Assessment**	
.6 CMS Progress Reports		.1 Human/Ecological Assessment	
7 Lab Data. Soil-Sampling/Groundwater		.2 Compliance and Enforcement	
D.4 Corrective Action Remediation Implementation		.3 Enforcement Confidential	
1 CMI Correspondence		4 Ecological - Administrative Record	
2 CMI Workplan		5 Permitting	
3 CMI Program Reports and Oversight		6 Corrective Action Remediation Study	
4 CMI Draft/Final Reports		7 Corrective Action/Remediation Implementation	
5 CMI QAPP		8 Endangered Species Act	
6 CMI Correspondence		9 Environmental Justice	

Note Transmittal Letter to Be Included with Reports

Comments Documents do not satisfy intended field generated data!

A.2 Part A/
Interim Status

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

November 3, 1994

AMEROCK CORP
ATTN:PHILIP BELL
PO BOX 7018
ROCKFORD IL 61125

RE: US EPA ID Number ILD 000 806 190

Location: 416 S MAIN ST
ROCKFORD IL 61101

In response to your correspondence of 10-21-94, the following information has been updated:

CONTACT TELEPHONE #	815-969-6235
GENERATOR STATUS TO	LARGE QUANTITY

If you have any questions, please call me at (312) 886-6173.

Sincerely,

Sharon Kiddon

Sharon Kiddon
RCRA Notifications Coordinator
Waste Management Division

cc: State Agency
File

UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION V
230 SOUTH DEARBORN ST.
CHICAGO, ILLINOIS 60604

MAR 22 1982

REPLY TO ATTENTION OF:
RCRA ACTIVITIES

Mr. Julin Rodger
Manager Environmental Control
Amerock Corporation
4000 Auburn Street
Rockford, Illinois 61101

RE: Interim Status Acknowledgement USEPA ID No. ILD000806190
FACILITY NAME: Amerock Corporation

Dear Mr. Rodger:

This is to acknowledge that the U.S. Environmental Protection Agency (USEPA) has completed processing your Part A Hazardous Waste Permit Application. It is the opinion of this office that the information submitted is complete and that you, as an owner or operator of a hazardous waste management facility, have met the requirements of Section 3005(e) of the Resource Conservation and Recovery Act (RCRA) for Interim Status. However, should USEPA obtain information which indicates that your application was incomplete or inaccurate, you may be requested to provide further documentation of your claim for Interim Status. Our opinion will be reevaluated on the basis of this information.

As an owner or operator of a hazardous waste management facility, you are required to comply with the interim status standards as prescribed in 40 CFR Parts 122 and 265, or with State rules and regulations in those States which have been authorized under Section 3006 of RCRA. In addition, you are reminded that operating under interim status does not relieve you from the need to comply with all applicable State and local requirements.

The printout enclosed with this letter identifies the limit(s) of the process design capacities your facility may use during the interim status period. This information was obtained from your Part A Permit application. If you wish to handle new wastes, to change processes, to increase the design capacity of existing processes, or to change ownership or operational control of the facility, you may do so only as provided in 40 CFR Sections 122.22 and 122.23.

As stated in the first paragraph of this letter, you have met the requirements of 40 CFR Part 122.23; your facility may operate under interim status until such time as a permit is issued or denied. This will be preceded by a request from this office or the State (if authorized) for Part B of your application. Please contact Arthur Kawatachi of my staff at (312) 886-7449, if you have any questions concerning this letter or the enclosure.

Sincerely yours,

Karl J. Klepitsch, Jr., Chief
Waste Management Branch

Enclosure

RS 3/19/82

FACILITY NAME	EPA ID NUMBER
AMEROCK CORP	ILD000806190

FACILITY OPERATOR
AMEROCK CORP

FACILITY OWNER
AMEROCK CORP

FACILITY LOCATION
416 SOUTH MAIN ST
ROCKFORD IL 61101

PROCESS CODE	DESIGN CAPACITY	UNIT OF MEASURE
S01	1210.00000	G

KEY

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE
STORAGE:		
CONTAINER	S01	G OR L
TANK	S02	G OR L
WASTE PILE	S03	Y OR C
SURFACE IMPOUNDMENT	S04	G OR L
DISPOSAL:		
INJECTION WELL	D79	G,L,U, OR V
LANDFILL	D80	A OR F
LAND APPLICATION	D81	B OR Q
OCEAN DISPOSAL	D82	U OR V
SURFACE IMPOUNDMENT	D83	G OR L
TREATMENT:		
TANK	T01	U OR V
SURFACE IMPOUNDMENT	T02	U OR V
INCINERATOR	T03	D,W,E, OR H
OTHER	T04	J,R,N,S,U,V

UNIT OF MEASURE	CODE
GALLONS	G
LITERS	L
CUBIC YARDS	Y
CUBIC METERS	C
GALLONS PER DAY	U
LITERS PER DAY	V
TONS PER HOUR	D
METRIC TONS\HOUR	W
GALLONS\HOUR	E
LITERS\HOUR	H
ACRE-FEET	A
HECTARE-METER	F
ACRES	B
HECTARES	Q
POUNDS\HOUR	J
KILOGRAMS\HOUR	R
TONS PER DAY	N
METRIC TONS\DAY	S

Part A

Please print or type with ELITE type (12 characters per inch) in the unshaded areas only

Form Approved, OMB No. 2050-0028 Expires 10/31/99
GSA No. 0246-EPA-OT

Please refer to Section V. Line-by-Line Instructions for Completing EPA Form 8700-12 before completing this form. The information requested here is required by law (Section 3010 of the *Resource Conservation and Recovery Act*).

Notification of Regulated Waste Activity

EPA United States Environmental Protection Agency

RECEIVED
MAR - 4 1999
PROGRAM MANAGEMENT BRANCH
REGION 5

Date Received (For Official Use Only)

2010300053

I. Installation's EPA ID Number *(Mark 'X' in the appropriate box)*

☐ A. Initial Notification ☒ B. Subsequent Notification *(Complete item C)*

C. Installation's EPA ID Number: ILD000806190

II. Name of Installation *(Include company and specific site name)*

E. THOMAS WOLD

III. Location of Installation *(Physical address not P.O. Box or Route Number)*

Street: 416 S. MAIN ST.

Street *(Continued)*:

City or Town: ROCKFORD | State: IL | Zip Code: 61101-

County Code: 201 | County Name: WINNEBAGO

IV. Installation Mailing Address *(See instructions)*

Street or P.O. Box: 3135 MADISON ST.

City or Town: BELLWOOD | State: IL | Zip Code: 60104-

V. Installation Contact *(Person to be contacted regarding waste activities at site)*

Name *(Last)*: WOLD | *(First)*: E THOMAS

Job Title: OWNER | Phone Number *(Area Code and Number)*: 708-544-4555

VI. Installation Contact Address *(See instructions)*

A. Contact Address Location ☐ Mailing ☒

B. Street or P.O. Box: (SAME)

City or Town: | State: | Zip Code: -

VII. Ownership *(See instructions)*

A. Name of Installation's Legal Owner: E. THOMAS WOLD

RECEIVED
MAR 31 1999
RCRA RECORDS ROOM
Waste, Pesticides & Toxics Division
U.S. EPA REGION 5

Street, P.O. Box, or Route Number: 3135 MADISON ST.

City or Town: BELLWOOD | State: IL | Zip Code: 60104-

Phone Number *(Area Code and Number)*	B. Land Type	C. Owner Type	D. Change of Owner Indicator	(Date Changed) Month	Day	Year
708-544-4555	P	P	Yes ☒ No ☐	05	18	98

OK 3/30/99

Please print or type with ELITE type (12 characters per inch) in the unshaded areas only

Form Approved, OMB No. 2050-0028 Expires 10/31/99
GSA No. 0246-EPA-OT

ID - For Official Use Only

VIII. Type of Regulated Waste Activity *(Mark 'X' in the appropriate boxes. Refer to Instructions)*

A. Hazardous Waste Activity

1. Generator (See Instructions)
   - ☐ a. Greater than 1000kg/mo (2,200 lbs.)
   - ☐ b. 100 to 1000 kg/mo (220-2,200 lbs.)
   - ☐ c. Less than 100 kg/mo (220 lbs)
2. Transporter (Indicate Mode in boxes 1-5 below)
   - ☐ a. For own waste only
   - ☐ b. For commercial purposes

Mode of Transportation
- ☐ 1. Air
- ☐ 2. Rail
- ☐ 3. Highway
- ☐ 4. Water
- ☐ *5. Other - specify*

☐ 3. Treater, Storer, Disposer (at installation) Note: A permit is required for this activity, see instructions.

4. Hazardous Waste Fuel
   - ☐ a. Generator Marketing to Burner
   - ☐ b. Other Marketers
   - ☐ c. Boiler and/or Industrial Furnace
     - ☐ 1. Smelter Deferral
     - ☐ 2. Small Quantity Exemption

   Indicate Type of Combustion Device(s)
   - ☐ 1. Utility Boiler
   - ☐ 2. Industrial Boiler
   - ☐ 3. Industrial Furnace

☐ 5. Underground Injection Control

B. Used Oil Recycling Activities

1. Used Oil Recycling Marketer
   - ☐ a. Marketer Directs Shipment of Used Oil to Off-Specification Burner
   - ☐ b. Marketer Who First Claims the Used Oil Meets the Specifications
2. Used Oil Burner - Indicate Type(s) of Combustion Device
   - ☐ a. Utility Boiler
   - ☐ b. Industrial Boiler
   - ☐ c. Industrial Furnace
3. Used Oil Transporter - Indicate Type(s) of Combustion Device(s)
   - a. Transporter
   - b. Transfer Facility
4. Used Oil Processor/Re-refiner - Indicate Type(s) of Activity(ies)
   - ☐ a. Process
   - ☐ b. Re-refine

IX. Description of Regulated Wastes *(Use additional sheets if necessary)*

A. Characteristics of Nonlisted Hazardous Wastes. *(Mark 'X' in the boxes corresponding to the characteristics of nonlisted hazardous wastes your installation handles; See 40 CFR Parts 261.20 - 261.24)*

1. Ignitable (D001)	2. Corrosive (D002)	3. Reactive (D003)	4. Toxicity Characteristic	(List specific EPA hazardous waste number(s) for the Toxicity characteristic contaminant(s))
☐	☐	☐	☐	

B. Listed Hazardous Wastes. *(See 40 CFR 261.31 - 33; See instructions if you need to list more than 12 waste codes.)*

1	2	3	4	5	6
7	8	9	10	11	12

C. Other Wastes. *(State or other wastes requiring a handler to have an I.D. number; See instructions.)*

1	2	3	4	5	6

X. Certification

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature	Name and Official Title *(Type or print)*	Date Signed
E. Thomas Wold	E. THOMAS WOLD OWNER	2/18/99

XI. Comments

This facility no longer generates either hazardous or non-hazardous waste. ID numbers can be deleted.

Note: Mail completed form to the appropriate EPA Regional or State Office. *(See Section III of the booklet for addresses.)*

Please print or type with ELITE type (12 characters per inch) in the unshaded areas only 2010300053

Form Approved. OMB No. 2050-0028. Expires 9-30-92
GSA No. 0246-EPA-OT

Please refer to the *Instructions for Filing Notification* before completing this form. The information requested here is required by law (Section 3010 of the Resource Conservation and Recovery Act).

EPA Notification of Regulated Waste Activity

United States Environmental Protection Agency

Date Received (For Official Use Only)

RECEIVED
OCT 21 1994

I. Installation's EPA ID Number (Mark 'X' in the appropriate box)

A. First Notification [ ]

B. Subsequent Notification (complete item C) [X]

C. Installation's EPA ID Number: ILD008061900

II. Name of Installation (Include company and specific site name)

AMEROCK CORPORATION

III. Location of Installation (Physical address not P.O. Box or Route Number)

Street: 416 SOUTH MAIN STREET

Street (continued):

City or Town: ROCKFORD

State: IL

ZIP Code: 61101-

County Code:

County Name: WINNEBAGO

IV. Installation Mailing Address (See instructions)

Street or P.O. Box: PO BOX 7018

City or Town: ROCKFORD

State: IL

ZIP Code: 61125-7018

V. Installation Contact (Person to be contacted regarding waste activities at site)

Name (last): BELL

(first): PHILIP

Job Title: PROJ. ENGINEER

Phone Number (area code and number): 815-969-6235

VI. Installation Contact Address (See instructions)

A. Contact Address Location [ ] Mailing [X]

B. Street or P.O. Box:

City or Town:

State:

ZIP Code:

VII. Ownership (See instructions)

A. Name of Installation's Legal Owner: NEWELL COMPANY

OCT 17 1994
IEPA/DLPC

Street, P.O. Box, or Route Number: 29 EAST STEPHENSON STREET

City or Town: FREEPORT

State: IL

ZIP Code: 61032-

Phone Number (area code and number): 815-235-4171

B. Land Type: P

C. Owner Type: P

D. Change of Owner Indicator: Yes [ ] No [X]

(Date Changed) Month Day Year:

Continue on reverse

Please print or type with ELITE type (12 characters per inch) in the unshaded areas only

Form Approved. OMB No. 2050-0028. Expires 9-30-92
GSA No. 0248-EPA-OT

ID - For Official Use Only

VIII. Type of Regulated Waste Activity *(Mark 'X' in the appropriate boxes. Refer to Instructions.)*

A. Hazardous Waste Activity

1. Generator (See instructions)
   - [X] a. Greater than 1000kg/mo (2,200 lbs.)
   - [ ] b. 100 to 1000 kg/mo (220 - 2,200 lbs.)
   - [ ] c. Less than 100 kg/mo (220 lbs.)
2. Transporter (Indicate Mode in boxes 1-5 below)
   - [ ] a. For own waste only
   - [ ] b. For commercial purposes

   Mode of Transportation
   - [ ] 1. Air
   - [ ] 2. Rail
   - [ ] 3. Highway
   - [ ] 4. Water
   - [ ] 5. Other - specify

   [ ]
3. [ ] Treater, Storer, Disposer (at installation) Note: A permit is required for this activity; see instructions.
4. Hazardous Waste Fuel
   - [ ] a. Generator Marketing to Burner
   - [ ] b. Other Marketers
   - [ ] c. Boiler and/or Industrial Furnace
     - [ ] 1. Smelter Deferral
     - [ ] 2. Small Quantity Exemption

     Indicate Type of Combustion Device(s)
     - [ ] 1. Utility Boiler
     - [ ] 2. Industrial Boiler
     - [ ] 3. Industrial Furnace
5. [ ] Underground Injection Control

B. Used Oil Fuel Activities

1. Off-Specification Used Oil Fuel
   - [ ] a. Generator Marketing to Burner
   - [ ] b. Other Marketer
   - [ ] c. Burner - Indicate device(s) - Type of Combustion Device
     - [ ] 1. Utility Boiler
     - [ ] 2. Industrial Boiler
     - [ ] 3. Industrial Furnace
2. [ ] Specification Used Oil Fuel Marketer (or On-site Burner) Who First Claims the Oil Meets the Specification

IX. Description of Regulated Wastes *(Use additional sheets if necessary)*

A. Characteristics of Nonlisted Hazardous Wastes. Mark 'X' in the boxes corresponding to the characteristics of nonlisted hazardous wastes your installation handles. *(See 40 CFR Parts 261.20 - 261.24)*

1. Ignitable (D001)	2. Corrosive (D002)	3. Reactive (D003)	4. Toxicity Characteristic (D000)	(List specific EPA hazardous waste number(s) for the Toxicity characteristic contaminant(s))			
X	X		X	D007	D035	D039	

B. Listed Hazardous Wastes. (See 40 CFR 261.31 - 33. See instructions if you need to list more than 12 waste codes.)

1	2	3	4	5	6
F001	F003	F005			
7	**8**	**9**	**10**	**11**	**12**

C. Other Wastes. (State or other wastes requiring a handler to have an I.D. number. See instructions.)

1	2	3	4	5	6

X. Certification

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature	Name and Official Title *(type or print)*	Date Signed
Duane R Greenly	Duane R. Greenly, V.P.-Operations	10/10/94

XI. Comments

The only changes made from the last submission of this document are a correction in the Installation Contact's telephone number and the change of generator status.

Note: Mail completed form to the appropriate EPA Regional or State Office. (See Section III of the booklet for addresses.)

Amerock Corporation
4000 Auburn Street P.O. Box 7018
Rockford, Illinois 61125-7018
Telephone: 815-963-9631

A MEMBER OF
The newell group™

February 15, 1993

Illinois Environmental Protection Agency
Division of Land Pollution Control
Planning and Reporting Unit
P. O. Box 19276
Springfield, IL 62794-9276

ATTN: Mr. Jim Pierce

Dear Mr. Pierce:

Please find enclosed an updated Notification of Regulated Waste Activity for Amerock Corporation, ILD 000 806 190 (South Main Street facility). We are unaware of the Winnebago County Code, and have therefore inserted the county name as directed in the instructions.

If there are any questions concerning the updated form, please contact me at (815) 969-6235.

Sincerely,

Philip S. Bell
Sr. Project Engineer

cc: J. Watson
R. Green
P. Schultz

Part A

Please print or type with ELITE type (12 characters per inch) in the unshaded areas only

Form Approved. OMB No. 2050-0028. Expires 10-31-97
GSA No. 0245-EPA-OT

Please refer to the *Instructions for Filing Notification* before completing this form. The information requested here is required by law (*Section 3010 of the Resource Conservation and Recovery Act*).

EPA Notification of Regulated Waste Activity

United States Environmental Protection Agency

Date Received (For Official Use Only)

RECEIVED
MAR 0 1 1993

I. Installation's EPA ID Number *(Mark 'X' in the appropriate box)*

A. First Notification	B. Subsequent Notification *(complete item C)*	C. Installation's EPA ID Number
[ ]	[X]	ILD000806190

II. Name of Installation *(Include company and specific site name)* 2010300053

AMEROCK CORPORATION

III. Location of Installation *(Physical address not P.O. Box or Route Number)*

Street: 416 SOUTH MAIN STREET

Street (continued):

City or Town	State	ZIP Code
ROCKFORD	IL	61101-

County Code	County Name
	WINNEBAGO

IV. Installation Mailing Address *(See Instructions)*

Street or P.O. Box: P.O. BOX 7018

City or Town	State	ZIP Code
ROCKFORD	IL	61125-7018

V. Installation Contact *(Person to be contacted regarding waste activities at site)*

Name *(last)*	*(first)*
BELL	PHILIP

Job Title	Phone Number *(area code and number)*
PROJ. ENGINEER	815-969-6035

VI. Installation Contact Address *(See Instructions)*

A. Contact Address Location	A. Contact Address Mailing	B. Street or P.O. Box
[ ]	[X]	

City or Town	State	ZIP Code
		-

VII. Ownership *(See Instructions)*

A. Name of Installation's Legal Owner: NEWELL COMPANY

Street, P.O. Box, or Route Number: 29 EAST STEPHENSON STREET

City or Town	State	ZIP Code
FREEPORT	IL	61032-

Phone Number *(area code and number)*	B. Land Type	C. Owner Type	D. Change of Owner Indicator	(Date Changed) Month	Day	Year
815-235-4171	P	P	Yes [X] No [ ]	07	02	87

Please print or type with ELITE type (12 characters per inch) in the unshaded areas only

Form Approved. OMB No. 2050-0028. Expires 10-31-91
GSA No. 0246-EPA-DT

ID - For Official Use Only

VIII. Type of Regulated Waste Activity (Mark 'X' in the appropriate boxes. Refer to instructions.)

A. Hazardous Waste Activity

1. Generator (See Instructions)
   - [ ] a. Greater than 1000kg/mo (2,200 lbs.)
   - [X] b. 100 to 1000 kg/mo (220 - 2,200 lbs.)
   - [ ] c. Less than 100 kg/mo (220 lbs.)
2. Transporter (Indicate Mode in boxes 1-5 below)
   - [ ] a. For own waste only
   - [ ] b. For commercial purposes

   Mode of Transportation
   - [ ] 1. Air
   - [ ] 2. Rail
   - [ ] 3. Highway
   - [ ] 4. Water
   - [ ] 5. Other - specify
3. [ ] Treater, Storer, Disposer (at installation) Note: A permit is required for this activity; see instructions.
4. Hazardous Waste Fuel
   - [ ] a. Generator Marketing to Burner
   - [ ] b. Other Marketers
   - [ ] c. Burner - indicate device(s) - Type of Combustion Device
     - [ ] 1. Utility Boiler
     - [ ] 2. Industrial Boiler
     - [ ] 3. Industrial Furnace
5. [ ] Underground Injection Control

B. Used Oil Fuel Activities

1. Off-Specification Used Oil Fuel
   - [ ] a. Generator Marketing to Burner
   - [ ] b. Other Marketer
   - [ ] c. Burner - indicate device(s) - Type of Combustion Device
     - [ ] 1. Utility Boiler
     - [ ] 2. Industrial Boiler
     - [ ] 3. Industrial Furnace
2. [ ] Specification Used Oil Fuel Marketer (or On-site Burner) Who First Claims the Oil Meets the Specification

IX. Description of Regulated Wastes (Use additional sheets if necessary)

A. **Characteristics of Nonlisted Hazardous Wastes.** Mark 'X' in the boxes corresponding to the characteristics of nonlisted hazardous wastes your installation handles. *(See 40 CFR Parts 261.20 - 261.24)*

1. Ignitable (D001)	2. Corrosive (D002)	3. Reactive (D003)	4. Toxicity Characteristic (D000)	(List specific EPA hazardous waste number(s) for the Toxicity Characteristic contaminant(s))			
X	X		X	D007	D035	D039	

B. **Listed Hazardous Wastes.** (See 40 CFR 261.31 - 33. See instructions if you need to list more than 12 waste codes.)

1	2	3	4	5	6
F001	F003	F005			
7	**8**	**9**	**10**	**11**	**12**

C. **Other Wastes.** (State or other wastes requiring an I.D. number. See instructions.)

1	2	3	4	5	6

X. Certification

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment.

Signature	Name and Official Title *(type or print)*	Date Signed
Duane Greenly	Duane Greenly, V.P. of Operations	2/11/93

XI. Comments

Note: Mail completed form to the appropriate EPA Regional or State Office. (See Section III of the booklet for addresses.)

Please print or type with ELITE type *(12 characters per inch)* in the unshaded areas only

Form Approved. OMB No. 2050-0028. Expires 9-30-88.
GSA No. 0246-EPA-OT

United States Environmental Protection Agency
Washington, DC 20460

89.4792

EPA Notification of Hazardous Waste Activity

Please refer to the *Instructions for Filing Notification* before completing this form. The information requested here is required by law *(Section 3010 of the Resource Conservation and Recovery Act)*.

For Official Use Only

Comments

C C

RECEIV

Installation's EPA ID Number	Approved	Date Received (yr. mo. day)
C F ILD000806190 T/A C 1		MAR 27

I. Name of Installation

AMEROCK CORP-SOUTH MAIN PLT

II. Installation Mailing Address

Street or P.O. Box (C 3): 4000 AUBURN ST

City or Town (C 4)	State	ZIP Code
ROCKFORD	IL	61101

III. Location of Installation

Street or Route Number (C 5): 416 SOUTH MAIN ST

City or Town (C 6)	State	ZIP Code
ROCKFORD	IL	61101

IV. Installation Contact

Name and Title *(last, first, and job title)* (C 2)	Phone Number *(area code and number)*
JULIN RODGER MGR. ENG	8159639631

V. Ownership

A. Name of Installation's Legal Owner (C R)	B. Type of Ownership *(enter code)*
AMEROCK CORP	P

VI. Type of Regulated Waste Activity *(Mark 'X' in the appropriate boxes. Refer to instructions.)*

A. Hazardous Waste Activity

- [X] 1a. Generator
- [ ] 1b. Less than 1,000 kg/mo.
- [ ] 2. Transporter
- [X] 3. Treater/Storer/Disposer
- [ ] 4. Underground Injection
- [ ] 5. Market or Burn Hazardous Waste Fuel *(enter 'X' and mark appropriate boxes below)*
  - [ ] a. Generator Marketing to Burner
  - [ ] b. Other Marketer
  - [ ] c. Burner

B. Used Oil Fuel Activities

- [ ] 6. Off-Specification Used Oil Fuel *(enter 'X' and mark appropriate boxes below)*
  - [ ] a. Generator Marketing to Burner
  - [ ] b. Other Marketer
  - [ ] c. Burner
- [ ] 7. Specification Used Oil Fuel Marketer *(or On site Burner)* Who First Claims the Oil Meets the Specification

RECEIVED
APR 03 1989
RCRA-IMS
U.S. EPA, REGION V

VII. Waste Fuel Burning: Type of Combustion Device *(enter 'X' in all appropriate boxes to indicate type of combustion device(s) in which hazardous waste fuel or off-specification used oil fuel is burned. See instructions for definitions of combustion devices.)*

- [ ] A. Utility Boiler
- [ ] B. Industrial Boiler
- [ ] C. Industrial Furnace

VIII. Mode of Transportation *(transporters only — enter 'X' in the appropriate box(es)*

- [ ] A. Air
- [ ] B. Rail
- [ ] C. Highway
- [ ] D. Water
- [ ] E. Other *(specify)*

IX. First or Subsequent Notification

Mark 'X' in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your installation's EPA ID Number in the space provided below.

- [ ] A. First Notification
- [X] B. Subsequent Notification *(complete item C)*

C. Installation's EPA ID Number: ILD000806190

✓

* Per phone BAG

ID — I. Official Use Only														
C													T/A	C
W														1

X. Description of Hazardous Wastes *(continued from front)*

A. Hazardous Wastes from Nonspecific Sources. Enter the four-digit number from 40 *CFR* Part 261.31 for each listed hazardous waste from nonspecific sources your installation handles. Use additional sheets if necessary.

1	2	3	4	5	6
7	8	9	10	11	12

B. Hazardous Wastes from Specific Sources. Enter the four-digit number from 40 *CFR* Part 261.32 for each listed hazardous waste from specific sources your installation handles. Use additional sheets if necessary.

13	14	15	16	17	18
19	20	21	22	23	24
25	26	27	28	29	30

C. Commercial Chemical Product Hazardous Wastes. Enter the four-digit number from 40 *CFR* Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31	32	33	34	35	36
37	38	39	40	41	42
43	44	45	46	47	48

D. Listed Infectious Wastes. Enter the four-digit number from 40 *CFR* Part 261.34 for each hazardous waste from hospitals, veterinary hospitals, or medical and research laboratories your installation handles. Use additional sheets if necessary.

49	50	51	52	53	54

E. Characteristics of Nonlisted Hazardous Wastes. Mark 'X' in the boxes corresponding to the characteristics of nonlisted hazardous wastes your installation handles. *(See 40 CFR Parts 261.21 — 261.24)*

- ☒ 1. Ignitable *(D001)*
- ☐ 2. Corrosive *(D002)*
- ☐ 3. Reactive *(D003)*
- ☒ 4. Toxic *(D000)*

XI. Certification

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Signature	Name and Official Title *(type or print)*	Date Signed
[signature]	RONALD K. ENTRIKIN VP-OPERATIONS	3-17-89

Amerock®
An Anchor Hocking Company
Amerock Corporation • Rockford, Illinois 61125-7018 • Phone: (815) 963-9631

June 20, 1986

RCRA Activities
U.S. EPA Region V
Waste Management Division
P.O. Box A387
Chicago, Illinois 60690

Refer to: 2010300053 -- Winnebago County
Rockford/Amerock Corporation
ILD000806190

Dear Sir:

Enclosed please find a notification of hazardous waste activity form 8700-12 for the above-referenced facility. The purpose for this form is to delete "transporter" from the activities listed on the first notification, since this facility does not transport hazardous wastes.

Very truly yours,

Larry Swacina ms

Larry Swacina
Coordinator, Safety, Health and Hygiene

LS:ms
Enclosure

cc: Mark Haney, IEPA,
Division of Land Pollution Control

Chuck Helston, Thomas, Keeling and Moore

8/1/86 Maintenance sheet submitted to delete "TRANS" status. JMH

PAR

EPA

ACKNOWLEDGEMENT OF NOTIFICATION OF HAZARDOUS WASTE ACTIVITY
(VERIFICATION)

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act *(RCRA)*. Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER → ILD000806190 REACKNOWLEDGEMENT

AMEROCK CORP
4000 AUBURN ST
ROCKFORD IL 61101

INSTALLATION ADDRESS →

416 SOUTH MAIN ST
ROCKFORD IL 61101

EPA Form 8700-12B (4-80)

09/28/81

Please print or type with ELITE type *(12 characters/inch)* in the unshaded areas only.

Form Approved OMB No. 158-S79016
EPA No. 0246-EPA-OT

EPA

U.S. ENVIRONMENTAL PROTECTION AGENCY

NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

I. INSTALLATION'S EPA I.D. NO.

NAME OF INSTALLATION

II. INSTALLATION MAILING ADDRESS

III. LOCATION OF INSTALLATION

PLEASE PLACE LABEL IN THIS SPACE

0002 39 AUG 15 80

INSTRUCTIONS: If you received a preprinted label, affix it in the space at left. If any of the information on the label is incorrect, draw a line through it and supply the correct information in the appropriate section below. If the label is complete and correct, leave Items I, II, and III below blank. If you did not receive a preprinted label, complete all items. "Installation" means a single site where hazardous waste is generated, treated, stored and/or disposed of, or a transporter's principal place of business. Please refer to the INSTRUCTIONS FOR FILING NOTIFICATION before completing this form. The information requested herein is required by law *(Section 3010 of the Resource Conservation and Recovery Act).*

FOR OFFICIAL USE ONLY

COMMENTS: C

INSTALLATION'S EPA I.D. NUMBER	APPROVED	DATE RECEIVED (yr., mo., & day)
F ILD 000806190 F/A 2 C 1	A	80 08 18

I. NAME OF INSTALLATION

AMEROCK CORP

II. INSTALLATION MAILING ADDRESS

STREET OR P.O. BOX: 4000 AUBURN ST

CITY OR TOWN	ST.	ZIP CODE
ROCKFORD	IL	61101

III. LOCATION OF INSTALLATION

STREET OR ROUTE NUMBER: 416 SOUTH MAIN ST

CITY OR TOWN	ST.	ZIP CODE
ROCKFORD	IL	61101

IV. INSTALLATION CONTACT

NAME AND TITLE *(last, first, & job title)*	PHONE NO. *(area code & no.)*
JULIN RODGER	815 - 963 - 9631

V. OWNERSHIP

A. NAME OF INSTALLATION'S LEGAL OWNER: AMEROCK CORP

B. TYPE OF OWNERSHIP *(enter the appropriate letter into box)*

F = FEDERAL
M = NON-FEDERAL

M

VI. TYPE OF HAZARDOUS WASTE ACTIVITY *(enter "X" in the appropriate box(es))*

- [X] A. GENERATION
- [XX] B. TRANSPORTATION *(complete item VII)*
- [X] C. TREAT/STORE/DISPOSE
- [ ] D. UNDERGROUND INJECTION

VII. MODE OF TRANSPORTATION *(transporters only – enter "X" in the appropriate box(es))*

- [ ] A. AIR
- [ ] B. RAIL
- [X] C. HIGHWAY
- [ ] D. WATER
- [ ] E. OTHER *(specify):*

VIII. FIRST OR SUBSEQUENT NOTIFICATION

Mark "X" in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If it is not your first notification, enter your Installation's EPA I.D. Number in the space provided below.

- [X] A. FIRST NOTIFICATION
- [ ] B. SUBSEQUENT NOTIFICATION *(complete item C)*

C. INSTALLATION'S EPA I.D. NO.: ILD000806190

IX. DESCRIPTION OF HAZARDOUS WASTES

Please go to the reverse of this form and provide the requested information.

AUG 14 1980

EPA Form 8700-12 (6-80)

CONTINUE ON REVERSE

I.D. – FOR OFFICIAL USE ONLY

W I L D 0 0 0 8 0 6 1 9 0 | 2 | 1

IX. DESCRIPTION OF HAZARDOUS WASTES *(continued from front)*

A. HAZARDOUS WASTES FROM NON–SPECIFIC SOURCES. Enter the four–digit number from 40 CFR Part 261.31 for each listed hazardous waste from non–specific sources your installation handles. Use additional sheets if necessary.

1	2	3	4	5	6
F017					
7	**8**	**9**	**10**	**11**	**12**

B. HAZARDOUS WASTES FROM SPECIFIC SOURCES. Enter the four–digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific industrial sources your installation handles. Use additional sheets if necessary.

13	14	15	16	17	18
19	**20**	**21**	**22**	**23**	**24**
25	**26**	**27**	**28**	**29**	**30**

C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES. Enter the four–digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31	32	33	34	35	36
37	**38**	**39**	**40**	**41**	**42**
43	**44**	**45**	**46**	**47**	**48**

D. LISTED INFECTIOUS WASTES. Enter the four–digit number from 40 CFR Part 261.34 for each listed hazardous waste from hospitals, veterinary hospitals, medical and research laboratories your installation handles. Use additional sheets if necessary.

49	50	51	52	53	54

E. CHARACTERISTICS OF NON–LISTED HAZARDOUS WASTES. Mark "X" in the boxes corresponding to the characteristics of non–listed hazardous wastes your installation handles. *(See 40 CFR Parts 261.21 – 261.24.)*

[X] 1. IGNITABLE (D001) [X] 2. CORROSIVE (D002) [ ] 3. REACTIVE (D003) [X] 4. TOXIC (D000)

X. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE	NAME & OFFICIAL TITLE *(type or print)*	DATE SIGNED
John S. Eaton	JOHN S. EATON, V.P. FINANCE	8-12-80

AUG 14 1980

P4186452381

Illinois Environmental Protection Agency 2200 Churchill Road, Springfield, IL 62706

217/782-6761

Refer to: 2016300053 -- Winnebago County
Amerock Corp.
ILD000806190
RCRA - Permits

May 6, 1988

Amerock Corp.
416 S. Main St.
Rockford, Illinois 61101

Attn: Environmental Coordinator or
Plant Manager

Dear Sir:

According to Agency files, your facility currently manages hazardous waste in containers and/or tanks subject to the requirements of 35 IAC 700-725. 35 IAC 703.157(f) states that interim status for *any* hazardous waste storage or treatment facility will be terminated November 8, 1992, unless the facility submits Part B of the RCRA permit application for these units to this Agency by November 8, 1988. This letter is written to (1) make you aware of this requirement and (2) describe the actions which must be taken in response to this requirement.

According to 35 IAC 703.157(f), if an existing facility desires to (1) store hazardous waste on-site for greater than ninety (90) days, (2) treat hazardous waste, or (3) store hazardous waste as a commercial facility after November 8, 1992, it must submit Part B of the RCRA permit application to this Agency by November 8, 1988. The information which must be contained in this application is described in 35 IAC 703, Subpart B. The enclosed document, entitled "RCRA Permit Guidance" provides more detail regarding the necessary contents of the application and also identifies several guidance documents which will be useful in developing the application. Also included in this document is the form which must be used when submitting the application.

If a facility does not desire to continue storing and/or treating hazardous waste after November 8, 1992, it must close the storage and/or treatment unit(s) present at the facility prior to this date. Closure, in this instance, basically means that all contamination must be removed from the unit(s) and if necessary, from the area surrounding these units. The requirements which must be met in closing these units are contained in 35 IAC 725, Subpart G. For you convenience, guidance for the development of a closure plan is contained in the enclosed document entitled "Instructions for the Preparation of Closure Plans for Interim Status RCRA Hazardous Waste Facilities." PLEASE NOTE THAT A CLOSURE PLAN DOES NOT NEED TO BE SUBMITTED AT THIS TIME. IT MUST HOWEVER, BE SUBMITTED TO THE AGENCY NO LATER THAN MAY 8, 1992.

In some instances, there may be several interim status hazardous waste management units at a facility. The facility may desire to pursue a final RCRA permit for a portion of these units and close the rest of them. Because of the uncertainty associated with this option, all interim status units at a facility must be included in Part B of the RCRA permit application, unless a closure plan for the units being closed is submitted with the Part B. If a closure plan is submitted with the Part B, the application need only address those units which will remain in operation.

The only alternatives available for hazardous waste treatment and storage facilities to meet the requirements of 35 IAC 703.157(f) are (1) submit Part B of the RCRA permit application by November 8, 1988 or (2) close by November 8, 1992. However, some facilities may have previously filed Part A of the RCRA permit application in error and now feel that the hazardous waste management activities carried out at the facility do not require a RCRA permit (i.e. the Part A was filed for protective measures). If this is the case, the Agency requests that information supporting this position be submitted no later than November 8, 1988. The Agency can then review the information submitted and correct its records accordingly. The information which must be submitted to make this demonstration is contained in the enclosed document entitled "Facility Part A Withdrawal Request Form."

Finally, some facilities may have closed or are currently closing in accordance with an IEPA approved closure plan. (Please bear in mind this letter is going out to over 200 facilities; some closed facilities may inadvertently receive this letter.) In this instance, the Agency requests that a copy of (1) the closure plan approval letter and (2) the letter from the Agency accepting the certifications of the owner/operator and the registered professional engineer that closure was carried out in accordance with the approved closure plan (if closure has been completed) be submitted by November 8, 1988. The Agency will again be able to review this information and correct its records accordingly.

Because of the large number of facilities subject to the requirements of 35 IAC 703.157(f), the Agency requests that all facilities receiving this letter complete the enclosed form entitled "RCRA Permit Information Form." The form has been developed such that it can be used by a facility falling into any of the five categories described above (pursuing a final permit, planning to close, pursuing a permit for only a portion of the interim status units and closing the other units, protective filers, closed in accordance with an IEPA approved closure plan). This form must be submitted to the Agency no later than November 8, 1988, along with all required attachments. Failure to do so may subject a facility to enforcement under State and/or Federal regulations and possible monetary penalties up to $25,000 per day of noncompliance.

The RCRA Permit Information Form and all required attachments must be submitted in triplicate (original and two (2) copies) to the following address:

Permit Section, RCRA Unit
Division of Land Pollution Control
Illinois Environmental Protection Agency
2200 Churchill Road
P.O. Box 19276
Springfield, IL 62794-9276

If you have any questions regarding this letter, please contact Jim Moore at 217/782-9875.

Very truly yours,

Lawrence W. Eastep, P.E., Manager
Permit Section
Division of Land Pollution Control

LWE:JKM:rd1313j/1314j

Enclosures

cc: Division File
Compliance
Rockford Region
USEPA Region V

Please print or type in the unshaded areas only
(fill—in areas are spaced for elite type, i.e., 12 characters/inch).

Form Approved OMB No. 158-R0175

FORM 1 GENERAL

EPA

U.S. ENVIRONMENTAL PROTECTION AGENCY

GENERAL INFORMATION

Consolidated Permits Program

(Read the "General Instructions" before starting.)

I. EPA I.D. NUMBER

F ILD000806190

LABEL ITEMS

- I. EPA I.D. NUMBER
- III. FACILITY NAME
- V. FACILITY MAILING ADDRESS
- VI. FACILITY LOCATION

ILD000806190
Amerock - South Main
P.O. Box 7018
Rockford, IL 61125-7018

416 South Main Street
Rockford, IL 61125

RECEIVED
MAY 05 1987
U.S. EPA, REGION V

GENERAL INSTRUCTIONS

If a preprinted label has been provided, affix it in the designated space. Review the information carefully; if any of it is incorrect, cross through it and enter the correct data in the appropriate fill—in area below. Also, if any of the preprinted data is absent *(the area to the left of the label space lists the information that should appear)*, please provide it in the proper fill—in area(s) below. If the label is complete and correct, you need not complete Items I, III, V, and VI *(except VI-B which must be completed regardless)*. Complete all items if no label has been provided. Refer to the instructions for detailed item descriptions and for the legal authorizations under which this data is collected.

II. POLLUTANT CHARACTERISTICS

INSTRUCTIONS: Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to any questions, you must submit this form and the supplemental form listed in the parenthesis following the question. Mark "X" in the box in the third column if the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your activity is excluded from permit requirements; see Section C of the instructions. See also, Section D of the instructions for definitions of bold—faced terms.

SPECIFIC QUESTIONS	MARK 'X' YES	NO	FORM ATTACHED
A. Is this facility a **publicly owned treatment works** which results in a **discharge** to **waters of the U.S.**? (FORM 2A)		X	
B. Does or will this facility *(either existing or proposed)* include a **concentrated animal feeding operation** or **aquatic animal production facility** which results in a **discharge** to **waters of the U.S.**? (FORM 2B)		X	
C. Is this a facility which currently results in **discharges** to **waters of the U.S.** other than those described in A or B above? (FORM 2C)		X	
D. Is this a proposed facility *(other than those described in A or B above)* which will result in a **discharge** to **waters of the U.S.**? (FORM 2D)		X	
E. Does or will this facility treat, store, or dispose of **hazardous wastes**? (FORM 3)	X		X
F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)		X	
G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)		X	
H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)		X	
I. Is this facility a proposed **stationary source** which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an **attainment area**? (FORM 5)		X	
J. Is this facility a proposed **stationary source** which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an **attainment area**? (FORM 5)		X	

III. NAME OF FACILITY

1 SKIP: AMEROCK - SOUTH MAIN

IV. FACILITY CONTACT

A. NAME & TITLE *(last, first, & title)*	B. PHONE *(area code & no.)*
2 SWACINA LARRY COORD. SAF. AND HLTH	815 963 9631

V. FACILITY MAILING ADDRESS

A. STREET OR P.O. BOX	
3 PO BOX 7018	

B. CITY OR TOWN	C. STATE	D. ZIP CODE
4 ROCKFORD	IL	61125

VI. FACILITY LOCATION

A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER	
5 416 SOUTH MAIN STREET	

RECEIVED
MAY 01 1987
SOLID WASTE SECTION
U.S. EPA, REGION V

B. COUNTY NAME	
WINNEBAGO	

C. CITY OR TOWN	D. STATE	E. ZIP CODE	F. COUNTY CODE (if known)
6 ROCKFORD	IL	61101	

CONTINUE ON REVERSE

CONTINUED FROM THE FRONT

VII. SIC CODES (4-digit, in order of priority)

A. FIRST: 3429 (specify) Hardware Manufacturer

B. SECOND: (specify)

C. THIRD: (specify)

D. FOURTH: (specify)

VIII. OPERATOR INFORMATION

A. NAME: AMEROCK CORPORATION

B. Is the name listed in Item VIII-A also the owner? ☐ YES ☒ NO

C. STATUS OF OPERATOR (Enter the appropriate letter into the answer box; if "Other", specify.)
F = FEDERAL, S = STATE, P = PRIVATE, M = PUBLIC (other than federal or state), O = OTHER (specify)
P (specify)

D. PHONE (area code & no.): A 815 963 9631

E. STREET OR P.O. BOX: PO BOX 7018

F. CITY OR TOWN: ROCKFORD

G. STATE: IL

H. ZIP CODE: 61125

IX. INDIAN LAND

Is the facility located on Indian lands? ☐ YES ☒ NO

X. EXISTING ENVIRONMENTAL PERMITS

A. NPDES (Discharges to Surface Water): 9 N IL0060968

D. PSD (Air Emissions from Proposed Sources): 9 P

B. UIC (Underground Injection of Fluids): 9 U

E. OTHER (specify): 9 (specify)

C. RCRA (Hazardous Wastes): 9 R ILD000806190

E. OTHER (specify): 9 (specify)

XI. MAP

Attach to this application a topographic map of the area extending to at least one mile beyond property bounderies. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in the map area. See instructions for precise requirements.

XII. NATURE OF BUSINESS (provide a brief description)

Manufacturer of Home Hardware.

XIII. CERTIFICATION (see instructions)

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attachments and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the application, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME & OFFICIAL TITLE (type or print)
Ronald K. Entrikin
Vice President of Manufacturing

B. SIGNATURE: Ronald K. Entrikin

C. DATE SIGNED: 4-23-87

COMMENTS FOR OFFICIAL USE ONLY

EPA Form 3510-1 (6-80) REVERSE

Please print or type in the unshaded areas only
(fill–in areas are spaced for elite type, i.e., 12 characters/inch).

Form Approved OMB No. 158-S80004

FORM 3 RCRA — EPA — U.S. ENVIRONMENTAL PROTECTION AGENCY
HAZARDOUS WASTE PERMIT APPLICATION
Consolidated Permits Program
(This information is required under Section 3005 of RCRA.)

I. EPA I.D. NUMBER: F ILD000806190 T/A C 1

FOR OFFICIAL USE ONLY

APPLICATION APPROVED	DATE RECEIVED (yr., mo., & day)	COMMENTS

II. FIRST OR REVISED APPLICATION

Place an "X" in the appropriate box in A or B below *(mark one box only)* to indicate whether this is the first application you are submitting for your facility or a revised application. If this is your first application and you already know your facility's EPA I.D. Number, or if this is a revised application, enter your facility's EPA I.D. Number in Item I above.

A. FIRST APPLICATION *(place an "X" below and provide the appropriate date)*

☐ 1. EXISTING FACILITY *(See instructions for definition of "existing" facility. Complete item below.)*

☐ 2. NEW FACILITY *(Complete item below.)*

C 8 — YR. / MO. / DAY — FOR EXISTING FACILITIES, PROVIDE THE DATE *(yr., mo., & day)* OPERATION BEGAN OR THE DATE CONSTRUCTION COMMENCED *(use the boxes to the left)*

YR. / MO. / DAY — FOR NEW FACILITIES, PROVIDE THE DATE *(yr., mo., & day)* OPERATION BEGAN OR IS EXPECTED TO BEGIN

B. REVISED APPLICATION *(place an "X" below and complete Item I above)*

☒ 1. FACILITY HAS INTERIM STATUS

☐ 2. FACILITY HAS A RCRA PERMIT

III. PROCESSES – CODES AND DESIGN CAPACITIES

A. PROCESS CODE — Enter the code from the list of process codes below that best describes each process to be used at the facility. Ten lines are provided for entering codes. If more lines are needed, enter the code(s) in the space provided. If a process will be used that is not included in the list of codes below, then describe the process *(including its design capacity)* in the space provided on the form *(Item III-C)*.

B. PROCESS DESIGN CAPACITY — For each code entered in column A enter the capacity of the process.
1. AMOUNT — Enter the amount.
2. UNIT OF MEASURE — For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Storage:		
CONTAINER *(barrel, drum, etc.)*	S01	GALLONS OR LITERS
TANK	S02	GALLONS OR LITERS
WASTE PILE	S03	CUBIC YARDS OR CUBIC METERS
SURFACE IMPOUNDMENT	S04	GALLONS OR LITERS
Disposal:		
INJECTION WELL	D79	GALLONS OR LITERS
LANDFILL	D80	ACRE-FEET *(the volume that would cover one acre to a depth of one foot)* OR HECTARE-METER
LAND APPLICATION	D81	ACRES OR HECTARES
OCEAN DISPOSAL	D82	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	D83	GALLONS OR LITERS
Treatment:		
TANK	T01	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	T02	GALLONS PER DAY OR LITERS PER DAY
INCINERATOR	T03	TONS PER HOUR OR METRIC TONS PER HOUR; GALLONS PER HOUR OR LITERS PER HOUR
OTHER *(Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or incinerators. Describe the processes in the space provided; Item III-C.)*	T04	GALLONS PER DAY OR LITERS PER DAY

UNIT OF MEASURE	UNIT OF MEASURE CODE
GALLONS	G
LITERS	L
CUBIC YARDS	Y
CUBIC METERS	C
GALLONS PER DAY	U
LITERS PER DAY	V
TONS PER HOUR	D
METRIC TONS PER HOUR	W
GALLONS PER HOUR	E
LITERS PER HOUR	H
ACRE-FEET	A
HECTARE-METER	F
ACRES	B
HECTARES	Q

EXAMPLE FOR COMPLETING ITEM III *(shown in line numbers X-1 and X-2 below)*: A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.

C DUP T/A C 1

LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY 1. AMOUNT (specify)	2. UNIT OF MEASURE (enter code)	FOR OFFICIAL USE ONLY
X-1	S 0 2	600	G	
X-2	T 0 3	20	E	
1	S 0 1	1320	G	
2				
3				
4				
5				
6				
7				
8				
9				
10				

Continued from page 2.
NOTE: Photocopy this page before completin ou have more than 26 wastes to list.

Form Approved OMB No. 158-S80004

EPA I.D. NUMBER (enter from page 1): W I L D 0 0 6 8 0 6 1 9 0 | T/A: | C: 1

FOR OFFICIAL USE ONLY: W | DUP | T/A: | C: 2 | DUP

V. DESCRIPTION OF HAZARDOUS WASTES (continued)

LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES 1. PROCESS CODES (enter)	D. PROCESSES 2. PROCESS DESCRIPTION (if a code is not entered in D(1))
1	D002	5,000	P	S01	
2	D007				Included with above.
3	D002	500	P	S01	
4	D002	100	P	S01	
5					
6					
7					
8					
9					
10					
11					
12					
13					
14					
15					
16					
17					
18					
19					
20					
21					
22					
23					
24					
25					
26					

Continued from the front.

IV. DESCRIPTION OF HAZARDOUS WASTES *(continued)*

E. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 3.

EPA I.D. NO. *(enter from page 1)*

													T/A	C
F	I	L	D	0	0	0	8	0	6	1	9	0		6

V. FACILITY DRAWING

All existing facilities must include in the space provided on page 5 a scale drawing of the facility *(see instructions for more detail)*.

VI. PHOTOGRAPHS

All existing facilities must include photographs *(aerial or ground–level)* that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas *(see instructions for more detail)*.

VII. FACILITY GEOGRAPHIC LOCATION

LATITUDE *(degrees, minutes, & seconds)*	LONGITUDE *(degrees, minutes, & seconds)*
42 16 08	89 05 50

VIII. FACILITY OWNER

☒ A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER	2. PHONE NO. *(area code & no.)*
E	

3. STREET OR P.O. BOX	4. CITY OR TOWN	5. ST.	6. ZIP CODE
F	G		

IX. ~~OWNER CERTIFICATION~~

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME *(print or type)*	B. SIGNATURE	C. DATE SIGNED
Ronald K. Entrikin Vice President of Manufacturing	Ronald K. Entrikin	4-23-87

X. OPERATOR CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME *(print or type)*	B. SIGNATURE	C. DATE SIGNED
S.B.		

517 ~~518~~

Amerock Corporation
4000 Auburn Street
Rockford, Illinois 61101
Phone (815) 963-9631

Amerock

fine decorative hardware for the look of fashion

November 18, 1980

EPA Region V
RCRA Activities
P. O. Box 7861
Chicago, IL. 60680

Gentlemen:

Enclosed find RCRA Form 1 - General Information and Form 3 - Hazardous Waste Information and appropriate diagrams, photographs, and maps for the three Amerock Plants located in Illinois. The three plants are:

Auburn Street Plant

South Main Plant

Winnebago Plant

You will note the absence of the EPA Identification Number for the Winnebago Plant in spite of the fact that one was applied for in August of this year. Repeated attempts to obtain this number from your office have failed.

Rodger Julin
Manager, Research &
Pollution Control

:ts
file
enclosures

NOV 18 1980

(fill—in areas are spaced for elite type, i.e., 12 characters/inch).

Form Approved OMB No. 158-R0175

FORM 1 GENERAL

U.S. ENVIRONMENTAL PROTECTION AGENCY

GENERAL INFORMATION

Consolidated Permits Program

(Read the "General Instructions" before starting.)

I. EPA I.D. NUMBER: F ILD000806190

LABEL ITEMS

I. EPA I.D. NUMBER

II. FACILITY NAME

V. FACILITY MAILING ADDRESS

VI. FACILITY LOCATION

PLEASE PLACE LABEL IN THIS SPACE

GENERAL INSTRUCTIONS

If a preprinted label has been provided, affix it in the designated space. Review the information carefully; if any of it is incorrect, cross through it and enter the correct data in the appropriate fill—in area below. Also, if any of the preprinted data is absent *(the area to the left of the label space lists the information that should appear)*, please provide it in the proper fill—in area(s) below. If the label is complete and correct, you need not complete Items I, III, V, and VI *(except VI-B which must be completed regardless)*. Complete all items if no label has been provided. Refer to the instructions for detailed item descriptions and for the legal authorizations under which this data is collected.

II. POLLUTANT CHARACTERISTICS

INSTRUCTIONS: Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to any questions, you must submit this form and the supplemental form listed in the parenthesis following the question. Mark "X" in the box in the third column if the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your activity is excluded from permit requirements; see Section C of the instructions. See also, Section D of the instructions for definitions of bold—faced terms.

SPECIFIC QUESTIONS	MARK 'X' YES	NO	FORM ATTACHED
A. Is this facility a publicly owned treatment works which results in a discharge to waters of the U.S.? (FORM 2A)		X	
B. Does or will this facility *(either existing or proposed)* include a concentrated animal feeding operation or aquatic animal production facility which results in a discharge to waters of the U.S.? (FORM 2B)		X	
C. Is this a facility which currently results in discharges to waters of the U.S. other than those described in A or B above? (FORM 2C)		X	
D. Is this a proposed facility *(other than those described in A or B above)* which will result in a discharge to waters of the U.S.? (FORM 2D)		X	
E. Does or will this facility treat, store, or dispose of hazardous wastes? (FORM 3)	X		X
F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)		X	
G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)		X	
H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)		X	
I. Is this facility a proposed stationary source which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X	
J. Is this facility a proposed stationary source which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X	

III. NAME OF FACILITY

1 SKIP: AMEROCK CORP

IV. FACILITY CONTACT

A. NAME & TITLE *(last, first, & title)*	B. PHONE *(area code & no.)*
2 JULIN L RODGER MGR ENV CONTROL	815 963 9631

V. FACILITY MAILING ADDRESS

A. STREET OR P.O. BOX			
3 4000 AUBURN ST			
B. CITY OR TOWN	**C. STATE**	**D. ZIP CODE**	
4 ROCKFORD	IL	61101	

COPY

VI. FACILITY LOCATION

A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER			
5 416 SOUTH MAIN ST.			
B. COUNTY NAME			
WINNEBAGO			
C. CITY OR TOWN	**D. STATE**	**E. ZIP CODE**	**F. COUNTY CODE** *(if known)*
6 ROCKFORD	IL	61101	

NOV 18 1980

CONTINUE ON REVERSE

CONTINUED FROM THE FRONT

VII. SIC CODES (4-digit, in order of priority)

A. FIRST	B. SECOND
3471 HARDWARE MANUFACTURER	(specify)

C. THIRD	D. FOURTH
(specify)	(specify)

VIII. OPERATOR INFORMATION

A. NAME: AMEROCK CORP

B. Is the name listed in Item VIII-A also the owner? [XX] YES [ ] NO

C. STATUS OF OPERATOR (Enter the appropriate letter into the answer box; if "Other", specify.)
F = FEDERAL; M = PUBLIC (other than federal or state); S = STATE; O = OTHER (specify); P = PRIVATE
P (specify)

D. PHONE (area code & no.): A 815 963 9631

E. STREET OR P.O. BOX: 4000 AUBURN ST

F. CITY OR TOWN: ROCKFORD

G. STATE: IL

H. ZIP CODE: 61101

IX. INDIAN LAND

Is the facility located on Indian lands? [ ] YES [X] NO

X. EXISTING ENVIRONMENTAL PERMITS

A. NPDES (Discharges to Surface Water)	D. PSD (Air Emissions from Proposed Sources)
9 N IL0060968	9 P

B. UIC (Underground Injection of Fluids)	E. OTHER (specify)
9 U	9 (specify)

C. RCRA (Hazardous Wastes)	E. OTHER (specify)
9 R	9 (specify)

XI. MAP

Attach to this application a topographic map of the area extending to at least one mile beyond property bounderies. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in the map area. See instructions for precise requirements.

XII. NATURE OF BUSINESS (provide a brief description)

HARDWARE MANUFACTURER

XIII. CERTIFICATION (see instructions)

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attachments and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the application, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME & OFFICIAL TITLE (type or print)	B. SIGNATURE	C. DATE SIGNED
MAURITZ JOHNSON VICE PRESIDENT-MANUFACTURING	K. J. Mauritz Johnson	11/17/80

COMMENTS FOR OFFICIAL USE ONLY

Please print or type in the unshaded areas only
(fill-in areas are spaced for elite type, i.e., 12 characters/inch).

Form Approved OMB No. 158-S80004

FORM 3 RCRA

U.S. ENVIRONMENTAL PROTECTION AGENCY

HAZARDOUS WASTE PERMIT APPLICATION

Consolidated Permits Program

(This information is required under Section 3005 of RCRA.)

I. EPA I.D. NUMBER: F

FOR OFFICIAL USE ONLY

APPLICATION APPROVED	DATE RECEIVED (yr., mo., & day)	COMMENTS

II. FIRST OR REVISED APPLICATION

Place an "X" in the appropriate box in A or B below *(mark one box only)* to indicate whether this is the first application you are submitting for your facility or a revised application. If this is your first application and you already know your facility's EPA I.D. Number, or if this is a revised application, enter your facility's EPA I.D. Number in Item I above.

A. FIRST APPLICATION *(place an "X" below and provide the appropriate date)*

[X] 1. EXISTING FACILITY *(See instructions for definition of "existing" facility. Complete item below.)*

[ ] 2. NEW FACILITY *(Complete item below.)*

FOR EXISTING FACILITIES, PROVIDE THE DATE *(yr., mo., & day)* OPERATION BEGAN OR THE DATE CONSTRUCTION COMMENCED *(use the boxes to the left)*

C | YR. 29 | MO. 12 | DAY 01

FOR NEW FACILITIES, PROVIDE THE DATE *(yr., mo., & day)* OPERATION BEGAN OR IS EXPECTED TO BEGIN

YR. | MO. | DAY

B. REVISED APPLICATION *(place an "X" below and complete Item I above)*

[ ] 1. FACILITY HAS INTERIM STATUS

[ ] 2. FACILITY HAS A RCRA PERMIT

III. PROCESSES – CODES AND DESIGN CAPACITIES

A. PROCESS CODE – Enter the code from the list of process codes below that best describes each process to be used at the facility. Ten lines are provided for entering codes. If more lines are needed, enter the code(s) in the space provided. If a process will be used that is not included in the list of codes below, then describe the process *(including its design capacity)* in the space provided on the form *(Item III-C)*.

B. PROCESS DESIGN CAPACITY – For each code entered in column A enter the capacity of the process.

1. AMOUNT – Enter the amount.
2. UNIT OF MEASURE – For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Storage:		
CONTAINER *(barrel, drum, etc.)*	S01	GALLONS OR LITERS
TANK	S02	GALLONS OR LITERS
WASTE PILE	S03	CUBIC YARDS OR CUBIC METERS
SURFACE IMPOUNDMENT	S04	GALLONS OR LITERS
Disposal:		
INJECTION WELL	D79	GALLONS OR LITERS
LANDFILL	D80	ACRE-FEET *(the volume that would cover one acre to a depth of one foot)* OR HECTARE-METER
LAND APPLICATION	D81	ACRES OR HECTARES
OCEAN DISPOSAL	D82	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	D83	GALLONS OR LITERS
Treatment:		
TANK	T01	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	T02	GALLONS PER DAY OR LITERS PER DAY
INCINERATOR	T03	TONS PER HOUR OR METRIC TONS PER HOUR; GALLONS PER HOUR OR LITERS PER HOUR
OTHER *(Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or incinerators. Describe the processes in the space provided; Item III-C.)*	T04	GALLONS PER DAY OR LITERS PER DAY

UNIT OF MEASURE	UNIT OF MEASURE CODE
GALLONS	G
LITERS	L
CUBIC YARDS	Y
CUBIC METERS	C
GALLONS PER DAY	U
LITERS PER DAY	V
TONS PER HOUR	D
METRIC TONS PER HOUR	W
GALLONS PER HOUR	E
LITERS PER HOUR	H
ACRE-FEET	A
HECTARE-METER	F
ACRES	B
HECTARES	Q

EXAMPLE FOR COMPLETING ITEM III *(shown in line numbers X-1 and X-2 below)*: A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.

S C | DUP | T/A | C 1

LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY 1. AMOUNT (specify)	B. PROCESS DESIGN CAPACITY 2. UNIT OF MEASURE (enter code)	FOR OFFICIAL USE ONLY	LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY 1. AMOUNT	B. PROCESS DESIGN CAPACITY 2. UNIT OF MEASURE (enter code)	FOR OFFICIAL USE ONLY
X-1	S02	600	G		5				
X-2	T03	20	E		6				
1	S01	1210	G		7				
2					8				
3					9				
4					10				

III. PROCESSES *(continued)*

C. SPACE FOR ADDITIONAL PROCESS CODES OR DESCRIBING OTHER PROCESSES *(code "T")*. FOR EACH PROCESS ENTERED HERE, INCLUDE DESIGN CAPACITY.

IV. DESCRIPTION OF HAZARDOUS WASTES

A. EPA HAZARDOUS WASTE NUMBER — Enter the four—digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four—digit number*(s)* from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

B. ESTIMATED ANNUAL QUANTITY — For each **listed waste** entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each **characteristic** or **toxic contaminant** entered in column A estimate the total annual quantity of all the non—listed waste*(s)* that will be handled which possess that characteristic or contaminant.

C. UNIT OF MEASURE — For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE	METRIC UNIT OF MEASURE	CODE
POUNDS	P	KILOGRAMS	K
TONS	T	METRIC TONS	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES

1. PROCESS CODES:
   For listed hazardous waste: For each **listed** hazardous waste entered in column A select the code*(s)* from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.
   For non—listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code*(s)* from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non—listed hazardous wastes that possess that characteristic or toxic contaminant.
   Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code*(s)*.

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER — Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B,C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV *(shown in line numbers X-1, X-2, X-3, and X-4 below)* — A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non—listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

LINE NO.	A. EPA HAZARD. WASTE NO. *(enter code)*	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE *(enter code)*	D. PROCESSES 1. PROCESS CODES *(enter)*	D. PROCESSES 2. PROCESS DESCRIPTION *(if a code is not entered in D(1))*
X-1	D 0 5 4	900	P	T 0 3 D 8 0	
X-2	D 0 0 2	400	P	T 0 3 D 8 0	
X-3	D 0 0 1	100	P	T 0 3 D 8 0	
X-4	D 0 0 2				included with above

Continued from page 2.
NOTE: Photocopy this page before completing if you have more than 26 wastes to list.

Form Approved OMB No. 158-S80004

EPA I.D. NUMBER (enter from page 1): W — T/A C: 1

FOR OFFICIAL USE ONLY: W DUP 2 DUP

IV. DESCRIPTION OF HAZARDOUS WASTES *(continued)*

LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES 1. PROCESS CODES (enter)	D. PROCESSES 2. PROCESS DESCRIPTION (if a code is not entered in D(1))
1	F017	4500	P	S01	
2	D002	10000	P	S01	
3	D004				included with above
4					
5					
6					
7					
8					
9					
10					
11					
12					
13					
14					
15					
16					
17					
18					
19					
20					
21					
22					
23					
25					
26					

EPA Form 3510-3 (6-80)

CONTINUE ON REVERSE

(enter "A", "B", "C", etc. behind the "3" to identify photocopied pages)

tinued from the front.

548

DESCRIPTION OF HAZARDOUS WASTES (continued)

USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE ..

547

EPA I.D. NO. (enter from page 1)

													T/A	C
														6
2											13	14		15

. FACILITY DRAWING

ll existing facilities must include in the space provided on page 5 a scale drawing of the facility *(see instructions for more detail).*

I. PHOTOGRAPHS

ll existing facilities must include photographs *(aerial or ground—level)* that clearly delineate all existing structures; existing storage, reatment and disposal areas; and sites of future storage, treatment or disposal areas *(see instructions for more detail).*

II. FACILITY GEOGRAPHIC LOCATION

LATITUDE (degrees, minutes, & seconds)						LONGITUDE (degrees, minutes, & seconds)					
4	2	1	6	0	6	8	9	0	6	4	0
65	66	67	68	69	71	72	73	75	76	77	79

III. FACILITY OWNER

☒ A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER		2. PHONE NO. (area code & no.)
		55 56 - 58 59 - 61 62 - 65
16		

3. STREET OR P.O. BOX	4. CITY OR TOWN	5. ST.	6. ZIP CODE
	C G		
15 45	15 40	41 42	47 - 51

X. OWNER CERTIFICATION

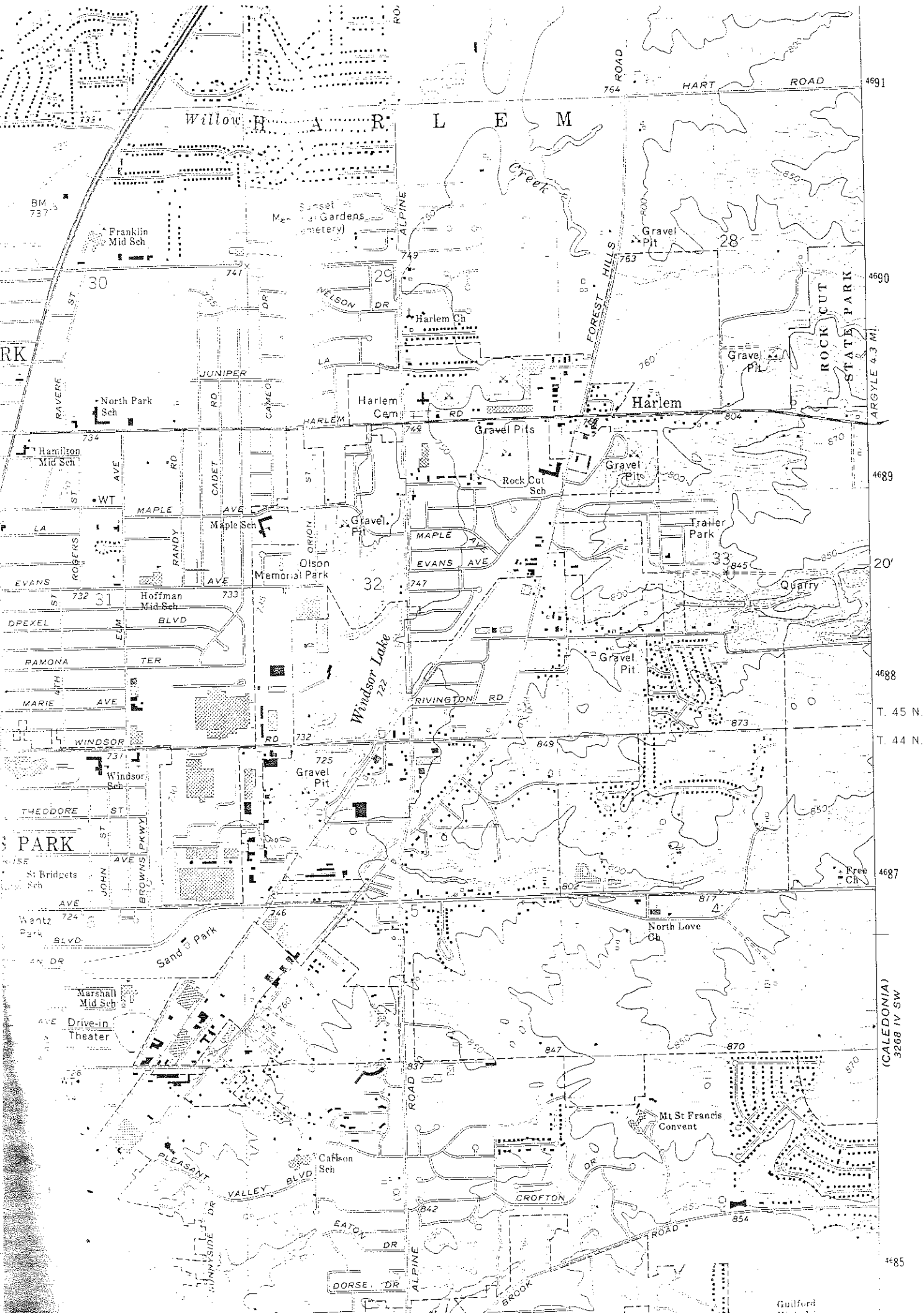
certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)	B. SIGNATURE	C. DATE SIGNED
MAURITZ JOHNSON VICE PRESIDENT-MANUFACTURING	X M. Mauritz Johnson	11/17/80

XI. OPERATOR CERTIFICATION

certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)	B. SIGNATURE	C. DATE SIGNED
MAURITZ JOHNSON VICE PRESIDENT-MANUFACTURING	X M. Mauritz Johnson	11/17/80


HARLEM
Willow Creek
HART ROAD
ALPINE ROAD
FOREST HILLS ROAD
ROCK CUT STATE PARK
ARGYLE 4.3 MI.
Franklin Mid Sch
Sunset Memorial Gardens (Cemetery)
Harlem Ch
Gravel Pit
Gravel Pits
Rock Cut Sch
Harlem Cem
Harlem
North Park Sch
Hamilton Mid Sch
Maple Sch
Olson Memorial Park
Hoffman Mid Sch
Trailer Park
Quarry
Windsor Lake
RIVINGTON RD
Windsor Sch
St Bridgets Sch
Wantz Park
Sand Park
Marshall Mid Sch
Drive-in Theater
Free Ch
North Love Ch
Mt St Francis Convent
Carlson Sch
PLEASANT VALLEY BLVD
CROFTON DR
EATON DR
DORSE DR
ALPINE ROAD
BROOK
Guilford
JUNIPER
HARLEM RD
MAPLE AVE
EVANS AVE
DREXEL BLVD
PAMONA TER
MARIE AVE
WINDSOR RD
THEODORE ST
NELSON DR
RAVERE ST
CADET RD
RANDY AVE
ORION ST
ROBERTS ST
JOHN ST
BROWNS PARK PKWY
SUNNYSIDE DR
T. 45 N.
T. 44 N.
(CALEDONIA) 3268 IV SW
4691
4690
4689
4688
4687
4685
20'

1 - Drum storage
2 - Drum storage
3 - Future storage

SOUTH MAIN STREET

CEDAR STREET

3

1 2

AMEROCK

SOUTH MAIN PLANT

156'

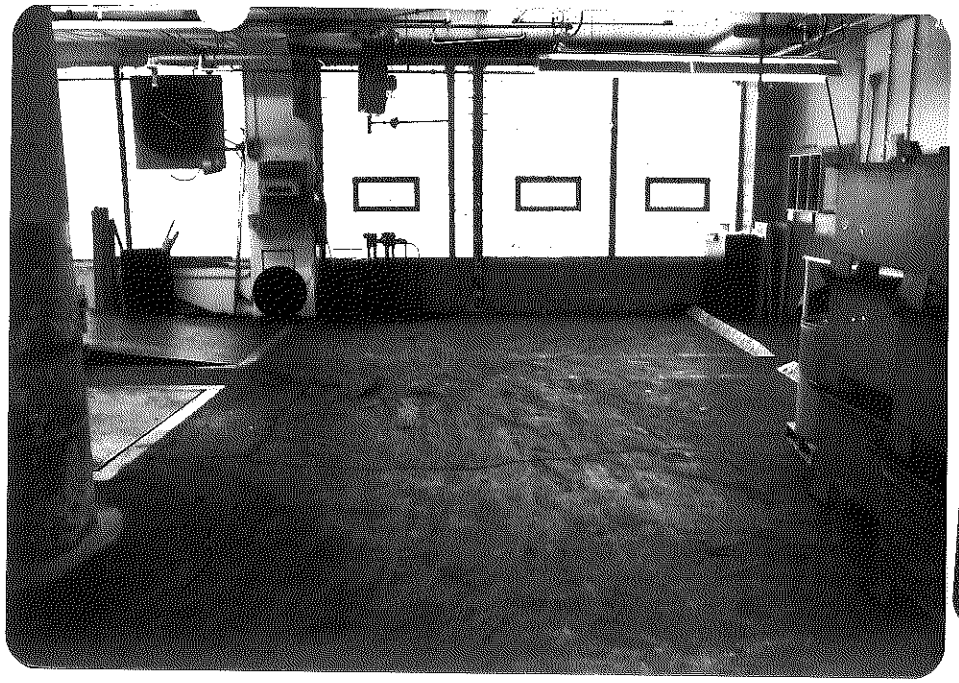
155'

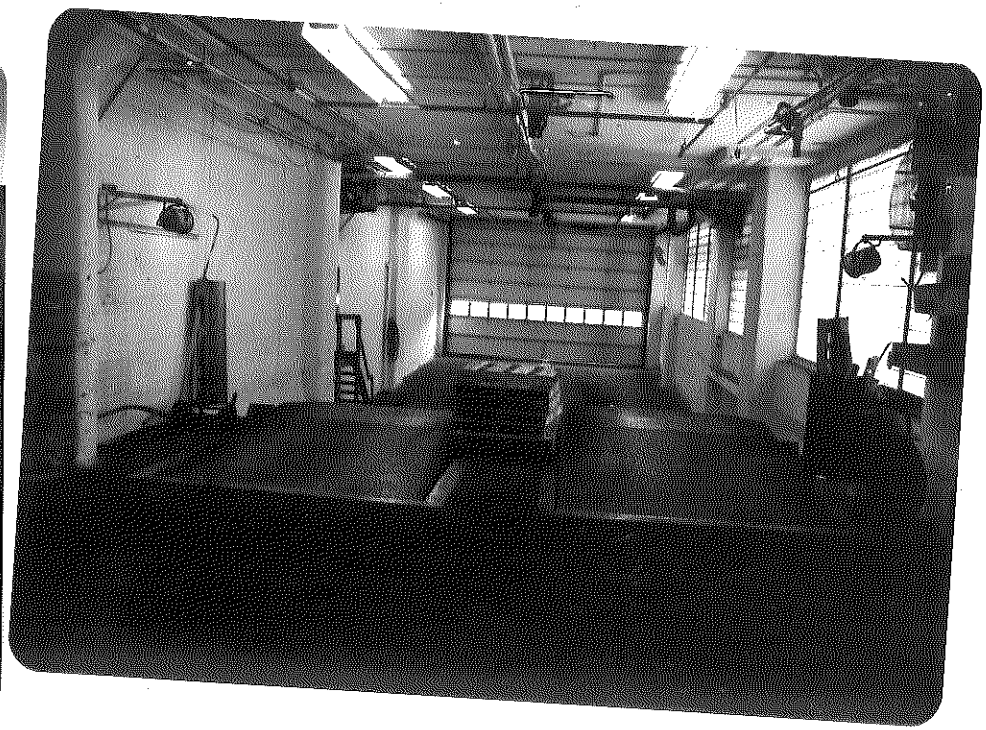
SOUTH WYMAN STREET

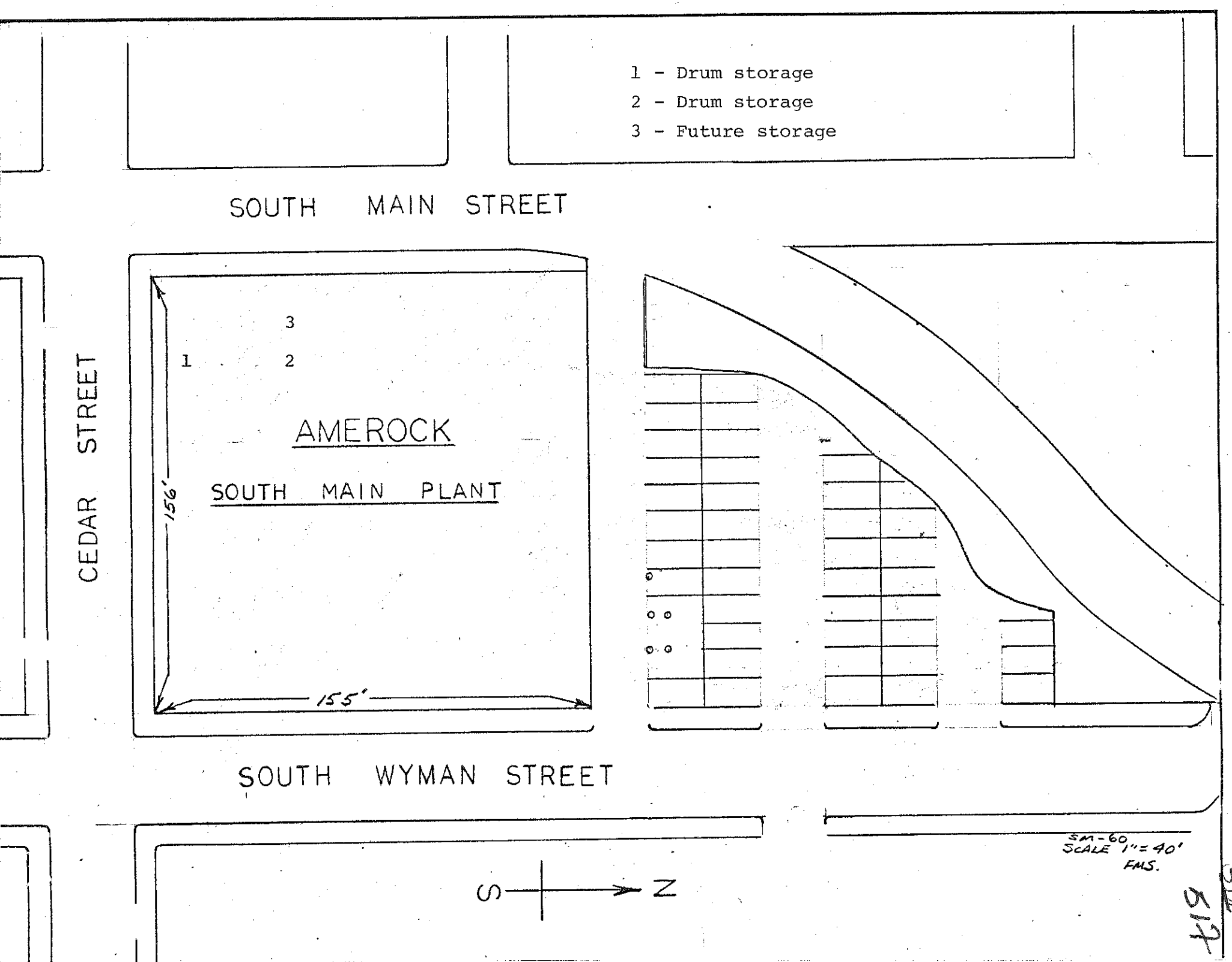
S → N

SM-60
SCALE 1" = 40'
FMS.

619






1 - Drum storage
2 - Drum storage
3 - Future storage
SOUTH MAIN STREET
CEDAR STREET
3
1
2
AMEROCK
SOUTH MAIN PLANT
156'
155'
SOUTH WYMAN STREET
S
N
SM-60
SCALE 1" = 40'
FMS.

A.4 Closure/ Post-Closure

Part B

Illinois Environmental Protection Agency · P. O. Box 19276, Springfield, IL 62794-9276

217/782-6762

Log No. C-447
Received: January 11, 1989

Refer to: 2010300053 -- Winnebago County
Rockford/Amerock Corp.
ILD000806190
RCRA-Closure

January 31, 1989

Amerock Corp.
Attn: Roger Julin
4000 Auburn Street
Post Office Box 7018
Rockford, Illinois 61125-7018

Dear Mr. Julin:

The closure plan dated January 3, 1989, submitted and prepared by Huff & Huff, Inc. has been reviewed by this Agency. Your final closure plan to close the two (2) hazardous waste container (SOI) storage areas is hereby approved subject to the following conditions.

1. Closure activities must be completed by September 1, 1989. When closure is complete the owner or operator must submit to the Agency certification both by the owner or operator and by an independent registered professional engineer that the facility has been closed in accordance with the specifications in the approved closure plan. This certification must be received at this Agency within 60 days after closure, or by November 1, 1989.

   The attached closure certification form must be used. Signatures must meet the requirements of 35 Ill. Adm. Code Section 702.126. The independent engineer should be present at all critical, major points (activities) during the closure. These might include soil sampling, soil removal, backfilling, final cover placement, etc. The frequency of inspections by the independent engineer must be sufficient to determine the adequacy of each critical activity. Financial assurance must be maintained for the units approved for closure herein until the Agency approves the facility's closure certification.

   The Illinois Professional Engineering Act (Ill. Rev. Stat., Ch. 111, par. 5101 et. seq.) requires that any person who practices professional engineering in the State of Illinois or implies that he (she) is a professional engineer must be registered under the Illinois Professional Engineering Act (par. 5101, Sec. 1). Therefore, any certification or engineering services which are performed for a closure plan in the State of Illinois must be done by an Illinois P.E. The closure plan must include a statement acknowledging this requirement.

Plans and specifications, designs, drawings, reports, and other documents rendered as professional engineering services, and revisions of the above must be sealed and signed by a professional engineer in accordance with par. 5113, sec. 13.1 of the Illinois Professional Engineering Act.

As part of the closure certification, to document the closure activities at your facility, please submit a Closure Documentation Report which includes:

a. The volume of waste and waste residue removed. The term waste includes wastes resulting from decontamination activities.

b. A description of the method of waste handling and transport.

c. The waste manifest numbers.

d. Copies of the waste manifests.

e. A description of the sampling and analytical methods used.

f. A chronological summary of closure activities and the cost involved.

g. Color photo documentation of closure. Document conditions before, during and after closure.

h. Tests performed, methods and results.

2. Along with your certification of closure, please submit a letter requesting withdrawal of your facility's Part A application.

3. If the Agency determines that implementation of this closure plan fails to satisfy the requirements of 35 Ill. Adm. Code, Section 725.211, the Agency reserves the right to amend the closure plan. Revisions of closure plans are subject to the appeal provisions of Section 40 of the Illinois Environmental Protection Act.

4. A request for release of financial assurance documents should be included with the closure certification documents.

5. Under the provisions of 29 CFR 1910 (51 FR 15,654, December 19, 1986), cleanup operations must meet the applicable requirements of OSHA's Hazardous Waste Operations and Emergency Response standard. These requirements include hazard communication, medical surveillance, health and safety programs, air monitoring, decontamination and training. General site workers engaged in activities that expose or potentially expose them to hazardous substances must receive a minimum of 40 hours of safety and health training off site plus a minimum of three days of actual field experience under the direct supervision of a trained experienced supervisor. Managers and supervisors at the cleanup site must have at least an additional eight hours of specialized training on managing hazardous waste operations.

6. The concrete surfaces shall be visually inspected, photographed and any residue adhering to the surface must be removed by scraping and/or brushing. Following this, the concrete surfaces must be steam cleaned and triple rinsed. All wash and rinse water shall be collected. If analysis of the wash or rinse water samples detect the presence of F005 then that material must be managed as a hazardous waste. If the wash or rinse water samples exhibit a characteristic of hazardous waste then that material must be managed as a hazardous waste. In any event the material must be managed as a special waste. If, after cleaning the concrete surfaces, any cracks, joints or other defects are found that would allow waste to migrate through the concrete, a closure plan modification request addressing contamination from possible waste migration at those locations must be submitted to this Agency within sixty (60) days of such a finding.

7. 35 IAC 721.131 F001 through F005 wastes must be disposed in accordance with 35 IAC Part 726.

Should you have any questions regarding this matter, please contact Eugene W. Dingledine at 217/782-6504.

Very truly yours,

Lawrence W. Eastep, P.E., Manager
Permit Section
Division of Land Pollution Control

LWE:EWD:rlc/0275k,40-43

Attachment

cc: Rockford Region
Division File - RCRA Closure
Andy Vollmer
James E. Huff, P.E.
USEPA Region V -- George Hamper
USEPA Region V -- Mary Murphy
Compliance Section

ATTACHMENT

This statement is to be completed by both the responsible officer and by the registered professional engineer upon completion of closure. Submit one copy of the certification with original signatures and three additional copies.

Closure Certification Statement

Closure Log C-447

The two (2) hazardous waste management SOI units at the facility described in this document have been closed in accordance with the specifications in the approved closure plan. I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

USEPA ID Number

Facility Name

Signature of Owner/Operator

Name and Title

Signature of Registered P.E.

Name of Registered P.E. and Illinois Registration Number

Date

EMD:rlc/0275k,40-44

Mary Murphy

Illinois Environmental Protection Agency · P. O. Box 19276, Springfield, IL 62794-9276

217/782-6762

Date Received: September 16, 1988
Log #C-447

Refer to: 2010300053 -- Winnebago County
Rockford/Amerock Corp.
ILD000806190
RCRA-Closure

Closed

December 2, 1988

Amerock Corp.
Attn: Rodger Julin
4000 Auburn St., P.O. Box 7018
Rockford, Illinois 61125-7018

Dear Mr. Julin:

The closure plan submitted and prepared by yourself has been reviewed.

Due to the following deficiencies, the plan has been disapproved.

1. DESCRIPTION OF THE FACILITY - The plan should describe the type of industry, Standard Industrial Code (SIC Code), products, location, size and other general, summarized information. The plan must address and identify each hazardous waste management unit at the facility. The plan narrative only addresses Storage Area #1. What is the status of Storage Area #2?

2. DESCRIPTION OF THE WASTE MANAGEMENT UNITS - Describe each unit at the facility and provide the process code and unit of measure code from the Part A (i.e., S01-1000 gal.). Include waste types for each unit (by standard chemical name and EPA Hazardous Waste No.), time period of use, dimensions, topography, soil types (as appropriate), and any other relevant matters. Identify these units by reference to line numbers on the Part A application. Plans for closure must address all units on the Part A application. If some of the unit(s) will not be closed until some date in the future, identify those units and their expected date of closure.

3. MAP OF FACILITY - The location of the facility on a topographic or county map should be provided, plus a more detailed scaled map or diagram of the facility, with each hazardous waste management unit clearly located and identified. Map scale must be specified. The location of the facility must be provided with respect to township, range and section.

4. STORAGE AREA PAVEMENT DESCRIPTION - Provide a description of the type of surface at the storage area(s), structural integrity (i.e., cracks, joints, deterioration) and containment structures (curbs). If containment structures are not present, describe the drainage features of the unit and its surroundings, and identify where spilled waste would flow.

5. DECONTAMINATION OF TANKS, STRUCTURES AND SOILS (35 IAC 725.212 and 725.214) - The owner/operator should describe all efforts to clean or decontaminate hazardous waste and its residues and constituents from tanks, paved areas, containment areas, equipment, structures, pipes, pumps, sumps and any other appurtenances to the hazardous waste management unit. The owner/operator may be requested to use any reasonable means to clean or decontaminate, including pressure washing, steam cleaning, scraping or other means. A description of how waste material (rinse water, etc.) from decontamination will be managed should also be provided. Please note that residue from listed hazardous waste must be managed as a hazardous waste unless it is delisted under the provisions of 35 IAC 720.120 and 720.122 or is exempt under 721.103(a)(2)(D). Disposal of hazardous waste and nonhazardous special waste within the State of Illinois requires a Waste Stream Permit issued by the Illinois EPA. Disposal of hazardous waste is also subject to Section 39(h) of the Environmental Protection Act, which prohibits land disposal without a demonstration from the generator that the waste can't be reasonably recycled for reuse, nor incinerated or chemically, physically or biologically treated to render the waste nonhazardous. The application for the Waste Stream Permit is to be filed by the landfill or treatment facility operator. The application for a 39(h) authorization is to be filed by the generator of the waste. For more information on Section 39(h), contact the Permit Section at 217/782-6762.

6. CERTIFICATION STATEMENT - All partial or full closures of hazardous waste management units must be certified by both the owner/operator and an independent registered professional engineer (35 IAC 725.215). The closure plan must include a statement acknowleding this requirement. Certification is due sixty (60) days after completion of closure and no more than 240 days from the date of closure plan approval (unless otherwise approved).

   The Illinois Professional Engineering Act (Ill. Rev. Stat., Ch. 111, par. 5101 et. seq.) requires that any person who practices professional engineering in the State of Illinois or implies that he (she) is a professional engineer must be registered under the Illinois Professional Engineering Act (par. 5101, Sec. 1). Therefore, any certification or engineering services which are performed for a closure plan in the State of Illinois must be done by an Illinois P.E. The closure plan must include a statement acknowledging this requirement.

Plans and specifications, designs, drawings, reports, and other documents rendered as professional engineering services, and revisions of the above must be sealed and signed by a professional engineer in accordance with par. 5119, sec. 13.1 of the Illinois Professional Engineering Act.

The independent engineer should be present during all major closure activities. These might include soil sampling, soil removal, backfilling, decontamination, final cover placement, etc. The frequency of inspections by the independent engineer must be sufficient to determine the adequacy of each critical activity. Certification must be furnished that the hazardous waste managements units have been has been closed in accordance with the specifications in the approved closure plan.

Pursuant to 725.212(d)(4), you must submit a complete, revised closure plan (ie., not just revised or additional pages) (one original and 3 copies) within thirty (30) days which adequately responds to the above noted comments. Failure to submit a revised plan within thirty (30) days of the date of your receipt of this letter will be considered non-compliance with the interim standards of 35 IAC, Part 725, Subpart G -- Closure and Post-closure and Subpart H -- Financial Requirements.

Should you have any questions concerning this matter, please contact Eugene W. Dingledine at 217/782-5504.

Very truly yours,

Lawrence W. Eastep, P.E., Manager
Permit Section
Division of Land Pollution Control

LWE:EWD:bjh/3679j/22,24

Enclosure

cc: Rockford Region
Division File
Andy Vollmer
USEPA Region V -- Mary Murphy
Compliance Section -- Geordie Smith

Illinois Environmental Protection Agency · P.O. Box 19276, Springfield, IL 62794-9276

217/782-6761

Refer to: 2010300053 -- Winnebago County
Amerock Corporation
Closure Plan Approved: October 23, 1989
Closure Log # C-447
ILD000806190
RCRA CLOSURE

December 4, 1989

Amerock Corporation - South Main Plant
416 South Main Street
Rockford, Illinois 61101

Gentlemen:

The subject hazardous waste management facility was inspected by a representative of this Agency on November 11, 1989. The inspection revealed that the closure activity was completed in accordance with the approved closure plan dated October 19, 1989.

Certification that the Amerock Corporation container storage areas (S01) have been closed in accordance with the approved closure plan by the owner/operator, Amerock Corporation, and an independent registered professional engineer of Illinois (James Huff), was received at this Agency on Octoner 23, 1989.

The Agency has determined that the closure of the container storage areas has apparently met the requirements of Interim Status Standards, 35 Ill. Admin. Code, Part 725 (40 CFR, Part 265). Please note, the Agency has withdrawn your Part A permit application.

This facility must continue to meet the requirements of 35 IAC Part 722: standards applicable to generators of hazardous waste.

In accordance with the requirements of 35 IAC 725.243(h), further maintenance of certain financial assurance mechanisms is no longer needed.

If you have any questions, please contact Dave Retzlaff at 815/987-7404.

Very truly yours,

Glenn D. Savage

Glenn D. Savage, Manager
Field Operations Section
Division of Land Pollution Control

GDS:TH

cc: Division File
Rockford Region
USEPA Region V, George Hamper
USEPA Region V, Marilyn Sabadaszka
USEPA Region V, Mary Villarreal
James Huff, P.E.
Andy Vollmer
Compliance Section
Permit Section
Mike Walwer

C.2 Compliance/ Enforcement

Ron, 2679
An update

THOMAS & HINSHAW, CULBERTSON

A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

220 East State Street • P.O. Box 1389 • Rockford, Illinois 61105 • 815·963-8488

TeleFax 815·965-9529
Telex 592-845

In reply refer to file no.

CHICAGO
222 NORTH LA SALLE STREET
CHICAGO, ILLINOIS 60601-1081
TEL (312) 704-3000
FAX (312) 704-3001

BELLEVILLE
521 WEST MAIN STREET
P.O. BOX 509
BELLEVILLE, ILLINOIS 62222
(618) 277-2400

BLOOMINGTON
2205 EAST EMPIRE
BLOOMINGTON, ILLINOIS 61704
(309) 662-6997

JOLIET
57 NORTH OTTAWA STREET
JOLIET, ILLINOIS 60431
(815) 726-5910

LAKE FOREST
273 MARKET SQUARE
LAKE FOREST, ILLINOIS 60045
(312) 234-6001

OAK BROOK
1211 WEST 22ND STREET
OAK BROOK, ILLINOIS 60521
(312) 573-6200

PEORIA
THOMAS & HINSHAW, CULBERTSON
456 FULTON STREET
PEORIA, ILLINOIS 61602
(309) 674-1025

SPRINGFIELD
400 SOUTH NINTH STREET
SPRINGFIELD, ILLINOIS 62701
(217) 528-7375

URBANA
102 EAST MAIN
URBANA, ILLINOIS 61801
(217) 367-0079

WAUKEGAN
415 WEST WASHINGTON STREET
WAUKEGAN, ILLINOIS 60085
(312) 244-0551

WHEATON
330 NAPERVILLE ROAD
WHEATON, ILLINOIS 60187
(312) 653-3135

BOCA RATON
2424 NORTH FEDERAL HIGHWAY
BOCA RATON, FLORIDA 33431
(407) 394-7111

MIAMI
200 SOUTH BISCAYNE BOULEVARD
MIAMI, FLORIDA 33131
(305) 358-7747

MILWAUKEE
KLUWIN, DUNPHY, HINSHAW, CULBERTSON
788 NORTH JEFFERSON STREET
MILWAUKEE, WISCONSIN 53202
(414) 276-6464

ST. LOUIS
1010 MARKET STREET
ST. LOUIS, MISSOURI 63101
(314) 421-6168

June 15, 1989

164888

Regional Administrator - Region V
Enforcement Division
U. S. Environmental Protection Agency
230 South Dearborn Street
Chicago, IL 60604

Re: Amerock Corporation (Soft Hammer Certification for F008 Waste)

To whom it may concern:

Approximately one week ago, we submitted on behalf of Amerock Soft Hammer Certifications for certain waste products. Unfortunately, reference to F008 waste was inadvertently and mistakenly included in those Soft Hammer Certification documents. The purpose of this letter is simply to request that you delete from those certification documents any such inadvertent reference to F008 waste.

As you may recall, some time ago, Amerock Corporation submitted various petitions to the Administrator of the E.P.A. relative to F006 wastes. Since, of course, F008 wastes are governed by the same previously promulgated standards as F006 wastes, we will simply supplement and amend our existing petitions before the Administrator to include F008 waste.

Should you have any questions concerning this matter, do not hesitate to contact me.

Sincerely,

CHARLES F. HELSTEN
For Thomas & Hinshaw, Culbertson

CFH:skl

cc: Rodger Julin

RECEIVED
JUN 19 1989
OFFICE OF RCRA
Waste Management
U.S. EPA, REGION V

1082 -RB

THOMAS & HINSHAW, CULBERTSON

A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

220 East State Street • P.O. Box 1389 • Rockford, Illinois 61105 • 815·963-8488

TeleFax 815·965-9529
Telex 592-845

CHICAGO
222 NORTH LA SALLE STREET
CHICAGO, ILLINOIS 60601-1081
TEL (312) 704-3000
FAX (312) 704-3001

BELLEVILLE
521 WEST MAIN STREET
PO. BOX 509
BELLEVILLE, ILLINOIS 62222
(618) 277-2400

BLOOMINGTON
2205 EAST EMPIRE
BLOOMINGTON, ILLINOIS 61704
(309) 662-6997

JOLIET
57 NORTH OTTAWA STREET
JOLIET, ILLINOIS 60431
(815) 726-5910

LAKE FOREST
273 MARKET SQUARE
LAKE FOREST, ILLINOIS 60045
(312) 234-6001

OAK BROOK
1211 WEST 22ND STREET
OAK BROOK, ILLINOIS 60521
(312) 573-6200

PEORIA
THOMAS & HINSHAW, CULBERTSON
456 FULTON STREET
PEORIA, ILLINOIS 61602
(309) 674-1025

SPRINGFIELD
400 SOUTH NINTH STREET
SPRINGFIELD, ILLINOIS 62701
(217) 528-7375

URBANA
102 EAST MAIN
URBANA, ILLINOIS 61801
(217) 367-0079

WAUKEGAN
415 WEST WASHINGTON STREET
WAUKEGAN, ILLINOIS 60085
(312) 244-0551

WHEATON
330 NAPERVILLE ROAD
WHEATON, ILLINOIS 60187
(312) 653-3135

BOCA RATON
2424 NORTH FEDERAL HIGHWAY
BOCA RATON, FLORIDA 33431
(407) 394-7111

MIAMI
200 SOUTH BISCAYNE BOULEVARD
MIAMI, FLORIDA 33131
(305) 358-7747

MILWAUKEE
KLUWIN, DUNPHY, HINSHAW, CULBERTSON
788 NORTH JEFFERSON STREET
MILWAUKEE, WISCONSIN 53202
(414) 276-6464

ST. LOUIS
1010 MARKET STREET
ST. LOUIS, MISSOURI 63101
(314) 421-6168

In reply refer to file no.

June 7, 1989

164888

O: WMD -
CC: RF
FED.EX. 3653225962

VIA FEDERAL EXPRESS

Regional Administrator - Region V
Enforcement Division
U. S. Environmental Protection Agency
230 South Dearborn Street
Chicago, IL 60604

ILD 000806190

RECEIVED
WMD/RCRA
RECORD CENTER
1/29/93

Re: Amerock Corporation (Soft Hammer Certification for F008, D003, D007 and D010 Wastes)

To whom it may concern:

Please be advised that our office represents Amerock Corporation, 4000 Auburn Street, Rockford, Illinois, relative to the above-mentioned matter.

Accordingly, please find enclosed herewith a Soft Hammer Certification for F008 (Cyanide Plating Bath Sludge), D003 (Reactive-Cyanide/Sulfide), D007 (Chromium), and D010 (Selenium) waste products.

Should you have any questions concerning any of the matter set for in the Soft Hammer Certification, do not hesitate to contact me at your earliest convenience.

Sincerely,

CHARLES F. HELSTEN
For Thomas & Hinshaw, Culbertson

CFH:skl

Enclosure

cc: Rodger Julin

RECEIVED
JUN 08 1989
U. S. EPA REGION 5
OFFICE OF REGIONAL ADMINISTRATOR

TO: Regional Administrator - Region V
Enforcement Division
U.S. Environmental Protection Agency
230 South Dearborn Street
Chicago, IL 60604

SOFT HAMMER CERTIFICATION FOR F008, D003, D007 AND D010 WASTES

Petitioner, AMEROCK CORPORATION, by and through its attorneys, THOMAS & HINSHAW, CULBERTSON, hereby presents this Soft Hammer Certification for F008 (Cyanide Plating Bath Sludge), D003 (Reactive-Cyanide/Sulfide), D007 (Chromium), and D010 (Selenium) wastes, and in support thereof, states as follows:

1. The E.P.A. proposed Land Disposal Restrictions for Second Third Wastes appearing in Vol. 54, No. 7, Federal Register, do not include treatment standards for F008, D003, D007 or D010 wastes. (54 F.R. 1096-98).

2. Soft hammer certification is available for all First and Second Third Wastes for which treatment standards have not yet been promulgated. (54 F.R. 1060).

3. The following information is provided by petitioner in accordance with the requirements of 40 C.F.R. 268.8 as appearing in 53 F.R. 31214-15:

a. Petitioner has made a good faith effort to locate and contract with treatment facilities practically available which provide the greatest environmental benefit with respect to disposal of F008, D003, D007 and D010 wastes. Such good faith effort includes contacting the following facilities:

1.a. Name of Facility: Chemical Services Corporation
b. Facility Official Contacted: Peter Brown
c. Facility Address: 13701 S. Kostner, Crestwood, IL 60445
d. Facility Telephone No.: 312-597-3380
e. Contact Date: (at various and sundry instances within the months of April and May, 1989)

2. Etc.

3. Etc.

b. (1) Through such contacts, petitioner has determined there is no practically available treatment for its F008, D003, D007 and D010 wastes. Such determination is based on the following facts or information: Amerock Corporation has, over the course of the past two months, discussed possible alternative methods of treatment of the above-mentioned waste substances. With respect to F008 wastes, Chemical Services has consulted with Cyano-Chem of Detroit, Michigan relative to treatment. To the best of Amerock's knowledge and belief, one tentative proposal brought forth by Chemical Services and Cyano-Chem provides, in general, generic terms, for some type of electrolysis of the waste substance, combined with a PH neutralization process, and subsequent further chemical treatment of the waste stream to remove the cyanide content included therein. (It should be noted that due to "trade secret" concerns, Cyano-Chem is somewhat reluctant to discuss specifics of its proposed treatment process).

With respect to D007 and D010 waste streams, Chemical Services Corporation has proposed that these substances first be chemically treated, and then combined with certain hydrocarbon constituents. This substance, then in turn, would be subjected to internal thermal destruction processes.

It should be noted, however, that each of the above-mentioned alternative methods of treatment of these waste streams are at this time, only theoretical in nature. This is due to the fact that only between 300-800 gallons per year of each of the above-mentioned waste streams are produced by Amerock as a result of its industrial and manufacturing processes. As such, sample specimens of this waste stream are not always readily available for testing and analysis during the course of a calendar year. Over the course of the past several months, Amerock has not accumulated any such by-product wastes, and accordingly, the degree of success in treatment of these waste streams by each of the above-mentioned proposed methods of treatment is, at this time, unknown. The above-listed consultants have advised that in the event, for one reason or another, that the respective methods of proposed treatment of these waste streams is not successful, the only feasible alternative method of treatment of these substances would be to dispose of the same within a landfill.

b. (1) I certify under penalty of law that the requirements of 40 C.F.R. 268.8 (a)(1) have been met and that disposal in a landfill or surface impoundment is the only practical alternative to treatment currently available. I believe that the information submitted is true, accurate, and complete. I am aware that there are significant penalities for submitting false information, including the possibility of fine and imprisonment.

Charles E. Helsten
Attorney for Amerock

SOFTHAMMER/skl:6/7/89

TO: Regional Administrator - Region V
Enforcement Division
U.S. Environmental Protection Agency
230 South Dearborn Street
Chicago, IL 60604

SOFT HAMMER CERTIFICATION FOR F008, D003, D007 AND D010 WASTES

Petitioner, AMEROCK CORPORATION, by and through its attorneys, THOMAS & HINSHAW, CULBERTSON, hereby presents this Soft Hammer Certification for F008 (Cyanide Plating Bath Sludge), D003 (Reactive-Cyanide/Sulfide), D007 (Chromium), and D010 (Selenium) wastes, and in support thereof, states as follows:

1. The E.P.A. proposed Land Disposal Restrictions for Second Third Wastes appearing in Vol. 54, No. 7, Federal Register, do not include treatment standards for F008, D003, D007 or D010 wastes. (54 F.R. 1096-98).

2. Soft hammer certification is available for all First and Second Third Wastes for which treatment standards have not yet been promulgated. (54 F.R. 1060).

3. The following information is provided by petitioner in accordance with the requirements of 40 C.F.R. 268.8 as appearing in 53 F.R. 31214-15:

a. Petitioner has made a good faith effort to locate and contract with treatment facilities practically available which provide the greatest environmental benefit with respect to disposal of F008, D003, D007 and D010 wastes. Such good faith effort includes contacting the following facilities:

1.a. Name of Facility: Chemical Services Corporation
b. Facility Official Contacted: Peter Brown
c. Facility Address: 13701 S. Kostner, Crestwood, IL 60445
d. Facility Telephone No.: 312-597-3380
e. Contact Date: (at various and sundry instances within the months of April and May, 1989)

2. Etc.

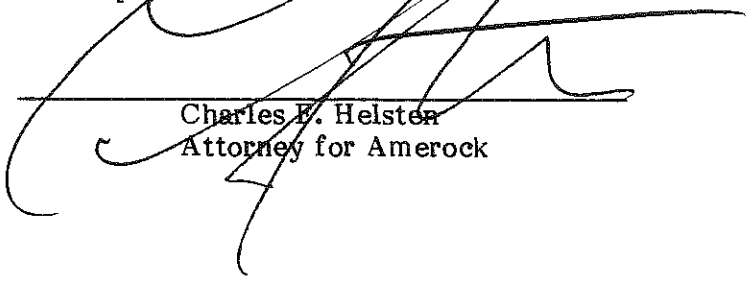
3. Etc.

b. (1) Through such contacts, petitioner has determined there is no practically available treatment for its F008, D003, D007 and D010 wastes. Such determination is based on the following facts or information: Amerock Corporation has, over the course of the past two months, discussed possible alternative methods of treatment of the above-mentioned waste substances. With respect to F008 wastes, Chemical Services has consulted with Cyano-Chem of Detroit, Michigan relative to treatment. To the best of Amerock's knowledge and belief, one tentative proposal brought forth by Chemical Services and Cyano-Chem provides, in general, generic terms, for some type of electrolysis of the waste substance, combined with a PH neutralization process, and subsequent further chemical treatment of the waste stream to remove the cyanide content included therein. (It should be noted that due to "trade secret" concerns, Cyano-Chem is somewhat reluctant to discuss specifics of its proposed treatment process).

With respect to D007 and D010 waste streams, Chemical Services Corporation has proposed that these substances first be chemically treated, and then combined with certain hydrocarbon constituents. This substance, then in turn, would be subjected to internal thermal destruction processes.

It should be noted, however, that each of the above-mentioned alternative methods of treatment of these waste streams are at this time, only theoretical in nature. This is due to the fact that only between 300-800 gallons per year of each of the above-mentioned waste streams are produced by Amerock as a result of its industrial and manufacturing processes. As such, sample specimens of this waste stream are not always readily available for testing and analysis during the course of a calendar year. Over the course of the past several months, Amerock has not accumulated any such by-product wastes, and accordingly, the degree of success in treatment of these waste streams by each of the above-mentioned proposed methods of treatment is, at this time, unknown. The above-listed consultants have advised that in the event, for one reason or another, that the respective methods of proposed treatment of these waste streams is not successful, the only feasible alternative method of treatment of these substances would be to dispose of the same within a landfill.

b. (1) I certify under penalty of law that the requirements of 40 C.F.R. 268.8 (a)(1) have been met and that disposal in a landfill or surface impoundment is the only practical alternative to treatment currently available. I believe that the information submitted is true, accurate, and complete. I am aware that there are significant penalities for submitting false information, including the possibility of fine and imprisonment.



Charles E. Helsten
Attorney for Amerock

SOFTHAMMER/skl:6/7/89

TO: Regional Administrator - Region V
Enforcement Division
U.S. Environmental Protection Agency
230 South Dearborn Street
Chicago, IL 60604

SOFT HAMMER CERTIFICATION FOR F008, D003, D007 AND D010 WASTES

Petitioner, AMEROCK CORPORATION, by and through its attorneys, THOMAS & HINSHAW, CULBERTSON, hereby presents this Soft Hammer Certification for F008 (Cyanide Plating Bath Sludge), D003 (Reactive-Cyanide/Sulfide), D007 (Chromium), and D010 (Selenium) wastes, and in support thereof, states as follows:

1. The E.P.A. proposed Land Disposal Restrictions for Second Third Wastes appearing in Vol. 54, No. 7, Federal Register, do not include treatment standards for F008, D003, D007 or D010 wastes. (54 F.R. 1096-98).

2. Soft hammer certification is available for all First and Second Third Wastes for which treatment standards have not yet been promulgated. (54 F.R. 1060).

3. The following information is provided by petitioner in accordance with the requirements of 40 C.F.R. 268.8 as appearing in 53 F.R. 31214-15:

a. Petitioner has made a good faith effort to locate and contract with treatment facilities practically available which provide the greatest environmental benefit with respect to disposal of F008, D003, D007 and D010 wastes. Such good faith effort includes contacting the following facilities:

1.a. Name of Facility: Chemical Services Corporation
b. Facility Official Contacted: Peter Brown
c. Facility Address: 13701 S. Kostner, Crestwood, IL 60445
d. Facility Telephone No.: 312-597-3380
e. Contact Date: (at various and sundry instances within the months of April and May, 1989)

2. Etc.

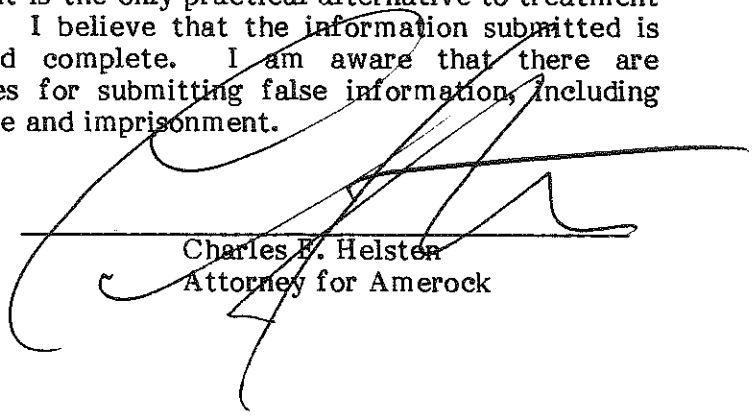
3. Etc.

b. (1) Through such contacts, petitioner has determined there is no practically available treatment for its F008, D003, D007 and D010 wastes. Such determination is based on the following facts or information: Amerock Corporation has, over the course of the past two months, discussed possible alternative methods of treatment of the above-mentioned waste substances. With respect to F008 wastes, Chemical Services has consulted with Cyano-Chem of Detroit, Michigan relative to treatment. To the best of Amerock's knowledge and belief, one tentative proposal brought forth by Chemical Services and Cyano-Chem provides, in general, generic terms, for some type of electrolysis of the waste substance, combined with a PH neutralization process, and subsequent further chemical treatment of the waste stream to remove the cyanide content included therein. (It should be noted that due to "trade secret" concerns, Cyano-Chem is somewhat reluctant to discuss specifics of its proposed treatment process).

With respect to D007 and D010 waste streams, Chemical Services Corporation has proposed that these substances first be chemically treated, and then combined with certain hydrocarbon constituents. This substance, then in turn, would be subjected to internal thermal destruction processes.

It should be noted, however, that each of the above-mentioned alternative methods of treatment of these waste streams are at this time, only theoretical in nature. This is due to the fact that only between 300-800 gallons per year of each of the above-mentioned waste streams are produced by Amerock as a result of its industrial and manufacturing processes. As such, sample specimens of this waste stream are not always readily available for testing and analysis during the course of a calendar year. Over the course of the past several months, Amerock has not accumulated any such by-product wastes, and accordingly, the degree of success in treatment of these waste streams by each of the above-mentioned proposed methods of treatment is, at this time, unknown. The above-listed consultants have advised that in the event, for one reason or another, that the respective methods of proposed treatment of these waste streams is not successful, the only feasible alternative method of treatment of these substances would be to dispose of the same within a landfill.

b. (1) I certify under penalty of law that the requirements of 40 C.F.R. 268.8 (a)(1) have been met and that disposal in a landfill or surface impoundment is the only practical alternative to treatment currently available. I believe that the information submitted is true, accurate, and complete. I am aware that there are significant penalities for submitting false information, including the possibility of fine and imprisonment.



Charles E. Helsten
Attorney for Amerock

SOFTHAMMER/skl:6/7/89

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

HRE-8J

June 25, 1992

Philip Bell, Environmental Engineer
Amerock Corp.
4000 Auburn Street
P.O. Box 7018
Rockford, Illinois 61125-7018

Re: Amerock Corp.
Rockford, IL 61125-7018
ILD 000 806 190

Dear Mr. Bell:

As indicated in the letter of introduction sent to you on December 11, 1991, the U.S. Environmental Protection Agency is enclosing a copy of the final Preliminary Assessment/Visual Site inspection (PA/VSI) report for the referenced facility. The executive summary and conclusions and recommendations sections have been withheld as Enforcement Confidential.

If you have any questions, please call Francene Harris at (312) 886-2884.

Sincerely yours,

Francene D. Harris

Kevin M. Pierard, Chief
Minnesota/Ohio Technical Enforcement Section
RCRA Enforcement Branch

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
230 SOUTH DEARBORN ST.
CHICAGO, ILLINOIS 60604

REPLY TO ATTENTION OF:
5HR-12

December 11, 1991

Philip Bell, Environmental Engineer
Amerock Corp.
4000 Auburn Street
P.O. Box 7018
Rockford, Illinois 61125-7018

Re: Visual Site Inspection
Amerock Corp.
ILD 000 806 190

Dear Mr. Bell:

The United States Environmental Protection Agency (U.S. EPA) Region V will conduct a Preliminary Assessment including a Visual Site Inspection (PA/VSI) at the referenced facility. This inspection is conducted pursuant to the Resource Conservation and Recovery Act, as amended (RCRA) Section 3007 and the Comprehensive Environmental Response, Compensation, and Liability Act, as amended (CERCLA) Section 104(e). The referenced facility has generated, treated, stored, or disposed of hazardous waste subject to RCRA. The PA/VSI requires identification and systematic review of all solid waste streams at the facility. The objective of the PA/VSI is to determine whether or not releases of hazardous wastes or hazardous constituents have occurred or are occurring at the facility which may require further investigation. This analysis will also provide information to establish priorities for addressing any confirmed releases.

The visual site inspection of your facility is to verify the location of all solid waste management units (SWMUs) and areas of concern (AOCs) to make a cursory determination of their condition by visual observation. The definitions of SWMUs and AOCs are included in Attachment I. The VSI supplements and updates data gathered during a preliminary file review. During this site inspection, no samples will be taken. A sampling visit to ascertain if releases of hazardous waste or constituents have occurred may be required at a later date.

Assistance of some of your personnel may be required in reviewing solid waste flow(s) or previous disposal practices. The site inspection is to provide a technical understanding of the present and past waste flows and handling, treatment, storage, and disposal practices. Photographs of the facility are necessary to document the condition of the units at the facility and the waste management practices used.

The VSI has been scheduled for December 17th at 2:00 pm. The inspection team will consist of Michael W. Gorman and Laura Czajkowski of Resource Applications, Inc., a contractor for the U.S. EPA. Representatives of the Indiana Department of Environmental Management (IDEM) may also be present. Your cooperation in admitting and assisting them while on site is appreciated.

The U.S. EPA recommends that personnel who are familiar with the present and past manufacturing and waste management activities be available during the VSI. Access to any relevant maps, diagrams, hydrogeologic reports, environmental assessment reports, sampling data sheets, environmental permits (air, NPDES), manifests and/or correspondence is also necessary, as such information is needed to complete the PA/VSI. Attachment II is a summary of the information required.

If you have any questions, please contact me at (312) 886-4448 or Francene Harris at (312) 886-2884. A copy of the Preliminary Assessment/Visual Site Inspection Report, excluding the conclusions and Executive Summary portion will be sent when the report is available.

Sincerely yours,

Francene D. Harris for
Kevin M. Pierard, Chief
OH/MN Technical Enforcement Section

enclosure

cc: Larry Eastep, IEPA

ATTACHMENT I

The definitions of solid waste management unit (SWMU) and area of concern (AOC) are as follows.

A SWMU is defined as any discernable unit where solid wastes have been placed at any time from which hazardous constituents might migrate, regardless of whether the unit was intended for the management of a solid or hazardous waste.

The SWMU definition includes the following:

- RCRA regulated units, such as container storage areas, tanks, surface impoundments, waste piles, land treatment units, landfills, incinerators, and underground injection wells
- Closed and abandoned units
- Recycling units, wastewater treatment units, and other units that U.S. Environmental Protection Agency has generally exempted from standards applicable to hazardous waste management units
- Areas contaminated by routine and systematic releases of wastes or hazardous constituents, such as wood preservative treatment dripping areas, loading or unloading areas, or solvent washing areas

An AOC is defined as any area where a release to the environment of hazardous wastes or constituents has occurred or is suspected to have occurred on a nonroutine or nonsystematic basis. This includes any area where such a release in the future is judged to be a strong possibility.

ATTACHMENT II

Amerock Corp.
416 South Main Street
Rockford, Illinois 61101

PROBABLE SOLID WASTE MANAGEMENT UNITS (SWMUs)

1. Little information was available to compile a list of solid waste management units (SWMUs) at your facility. Please list all waste management units at your facility. If possible, please provide as complete information for the waste unit in response to the questions below.

   From the list of probable SWMUs please address the following questions:

   - Do the above SWMUs still exist at the facility and are they in operation?
   - What are the start-up and closure dates of the above SWMUs?
   - What types of wastes are the SWMUs currently/formerly used for?
   - Name any SWMUs at your facility that have not been listed above. These would include hazardous waste storage areas, treatment units, or any other area or system at your facility dealing with hazardous waste including satellite accumulation areas.
   - What are the average volumes and rates of generation of waste streams?
   - Document any releases that have occurred at the facility. This includes spills or leaks of both wastes and raw product. Outline the action taken to clean up the release.

2. Please supply as much information as possible concerning the site history. This would include any information you have regarding operations and any other owner/operators at this location.

3. Please provide a description of the primary processes taking place at your facility and the waste streams which are generated.

4. Describe the methods of treatment and disposal of generated waste utilized by your facility.

If available, the following items are requested:

- A detailed map of the facility showing the location of the SWMUs and production stations.
- Flow diagrams showing waste streams and waste management practices.
- Copies of any permits currently held by the facility.
- SARA Title III information and a copy of the facility contingency plan.

D. Corrective Action

PRC Environmental Management, Inc.
233 North Michigan Avenue
Suite 1621
Chicago, IL 60601
312-856-8700
Fax 312-938-0118

PRELIMINARY ASSESSMENT/ VISUAL SITE INSPECTION

AMEROCK CORPORATION, A SUBSIDIARY OF THE NEWELL GROUP ROCKFORD, ILLINOIS ILD 000 806 190

FINAL REPORT

ILD 000 806 190

Prepared for

U.S. ENVIRONMENTAL PROTECTION AGENCY
Office of Waste Programs Enforcement
Washington, DC 20460

Work Assignment No.	:	C05087
EPA Region	:	5
Site No.	:	ILD 000 806 190
Date Prepared	:	March 9, 1992
Contract No.	:	68-W9-0006
PRC No.	:	009-C05087-IL3D
Prepared by	:	Resource Applications, Inc. (Laura Czajkowski)
Contractor Project Manager	:	Shin Ahn
Telephone No.	:	(312) 856-8700
EPA Work Assignment Manager	:	Kevin Pierard
Telephone No.	:	(312) 886-4448

LOW

TABLE OF CONTENTS

LIST OF ATTACHMENTS

LIST OF TABLES

LIST OF FIGURES

EXECUTIVE SUMMARY

Resource Applications, Inc. (RAI) performed a preliminary assessment and visual site inspection (PA/VSI) to identify and assess the existence and likelihood of releases from solid waste management units (SWMU) and other areas of concern (AOC) at the Amerock Corporation (Amerock) facility in Rockford, Illinois. This report summarizes the results of the PA/VSI and evaluates the potential for releases of hazardous wastes or hazardous constituents from SWMUs and AOCs identified. In addition, a completed U.S. Environmental Protection Agency (EPA) Preliminary Assessment Form (EPA Form 2070-12) is included in Attachment A to assist in prioritization of RCRA facilities for corrective action.

The Amerock facility is an assembly and finishing plant for window hardware. Operations include: parts cleaning, phosphating, chromating, painting, and lacquering. The facility generates and manages the following waste streams: spent methyl ethyl ketone (F005), waste chromate (D002, D007), waste oil, waste phosphate, and cleaner waste. The facility has operated at its current location since 1929. The facility occupies 0.5 acre in a light-industrial, commercial, residential, mixed-use area, and employs about 350 people. The facility's regulatory status is currently a small-quantity generator. Since 1929, Amerock has been located at the 416 South Main Street plant. The facility began operations on the 13th floor of the building. In the 1960's, Amerock purchased the building and began utilizing all 13 floors. In 1987, Amerock was purchased by the Newell Group and is now a subsidiary to them. In 1989, Amerock closed three drum storage areas (S01) that stored hazardous waste for greater than 90 days. Two of the areas, SWMU 7 and SWMU 8, no longer store hazardous waste. The third area, SWMU 5, currently stores hazardous waste for less than 90 days. The Illinois Environmental Protection Agency (IEPA) approved closure for the drum storage areas on December 4, 1989.

The PA/VSI identified the following eight SWMUs at the facility:

Solid Waste Management Units

1. Hazardous Waste Satellite Accumulation Areas
2. Parts Coating Waste Drum Storage Area
3. Waste Oil Drum Storage Area
4. Nonhazardous Waste Satellite Accumulation Areas
5. Hazardous Waste Container Storage Area
6. Spent Battery Storage Area
7. Former Drum Storage Area #1
8. Former Drum Storage Area #2

No areas of concern were identified at the facility.

The potential for release to ground water is low. There are no underground storage tanks located on-site. All hazardous waste storage units are located indoors, on the sixth floor of the building. The floor drains in the building are plugged.

The potential for release to surface water is low. All hazardous waste storage units are located on the sixth floor of the building. The floor drains in the building are plugged. The nearest surface water body is the Rock River located one block east of the facility. The river is used for recreational purposes.

The potential for release to air is low. Containers and drums are properly sealed. The electrostatic paint booths have a vent system that filters the drawn-in air.

The potential for release to on-site soils is low. There are no hazardous waste storage areas located outdoors. Drums and containers are properly sealed and floor drains are plugged. There are no underground storage tanks located on-site.

At the time of the VSI, RAI observed waste oil on the floor the the Waste Oil Drum Storage Area (SWMU 3). RAI recommends that the waste oil be cleaned up. RAI recommends no other action for this facility at this time.

1.0 INTRODUCTION

PRC Environmental Management, Inc. (PRC) received Work Assignment No. C05087 from the U.S. Environmental Protection Agency (EPA) under Contract No. 68-W9-0006 (TES 9) to conduct preliminary assessments (PA) and visual site inspections (VSI) of hazardous waste treatment and storage facilities in Region 5. Resource Applications, Inc. (RAI), TES 9 Team member, provided the necessary assistance to complete the PA/VSI activities for the Amerock Corporation (Amerock), a subsidiary of the Newell Group.

As part of the EPA Region 5 Environmental Priorities Initiative, the RCRA and CERCLA programs are working together to identify and address RCRA facilities that have a high priority for corrective action using applicable RCRA and CERCLA authorities. The PA/VSI is the first step in the process of prioritizing facilities for corrective action. Through the PA/VSI process, enough information is obtained to characterize a facility's actual or potential releases to the environment from solid waste management units (SWMU) and areas of concern (AOC).

A SWMU is defined as any discernible unit at a RCRA facility in which solid wastes have been placed and from which hazardous constituents might migrate, regardless of whether the unit was intended to manage solid or hazardous waste.

The SWMU definition includes the following:

- RCRA-regulated units, such as container storage areas, tanks, surface impoundments, waste piles, land treatment units, landfills, incinerators, and underground injection wells
- Closed and abandoned units
- Recycling units, wastewater treatment units, and other units that EPA has generally exempted from standards applicable to hazardous waste management units
- Areas contaminated by routine and systematic releases of wastes or hazardous constituents. Such areas might include a wood preservative drippage area, a loading-unloading area, or an area where solvent used to wash large parts has continually dripped onto soils.

An AOC is defined as any area where a release to the environment of hazardous waste or constituents has occurred or is suspected to have occurred on a nonroutine and nonsystematic basis. This includes any area where such a release in the future is judged to be a strong possibility.

The purpose of the PA is as follows:

- Identify SWMUs and AOCs at the facility
- Obtain information on the operational history of the facility
- Obtain information on releases from any units at the facility
- Identify data gaps and other informational needs to be filled during the VSI

The PA generally includes review of all relevant documents and files located at state offices and at the EPA Region 5 office in Chicago.

The purpose of the VSI is as follows:

- Identify SWMUs and AOCs not discovered during the PA
- Identify releases not discovered during the PA
- Provide a specific description of the environmental setting
- Provide information on release pathways and the potential for releases to each medium
- Confirm information obtained during the PA regarding operations, SWMUs, AOCs, and releases

The VSI includes interviewing appropriate facility staff, inspecting the entire facility to identify all SWMUs and AOCs, photographing all SWMUs, identifying evidence of releases, initially identifying potential sampling locations, and obtaining all information necessary to complete the PA/VSI report.

This report documents the results of a PA/VSI of the Amerock facility in Rockford, Illinois. The PA was completed on December 13, 1991. RAI gathered and reviewed information from Illinois Environmental Protection Agency (IEPA) and from EPA Region 5 RCRA files.

The VSI was conducted on December 17, 1991. It included interviews with Amerock facility representatives and a walk-through inspection of the facility. Eight SWMUs and no AOCs were identified at the facility.

RAI completed EPA Form 2070-12 using information gathered during the PA/VSI. This form is included in Attachment A. The VSI is summarized and 12 inspection photographs are included in Attachment B. Field notes from the VSI are included in Attachment C.

2.0 FACILITY DESCRIPTION

This section describes the facility's location, past and present operations (including waste management practices), waste generating processes, release history, regulatory history, environmental setting, and receptors.

2.1 FACILITY LOCATION

The Amerock facility located at 416 South Main Street in Rockford, Winnebago County, Illinois (latitude 42°16'06"N and longitude 89°06'40"W), as shown in Figure 1. The facility occupies approximately 0.5 acre in a light-industrial, commercial, residential, and mixed-use area.

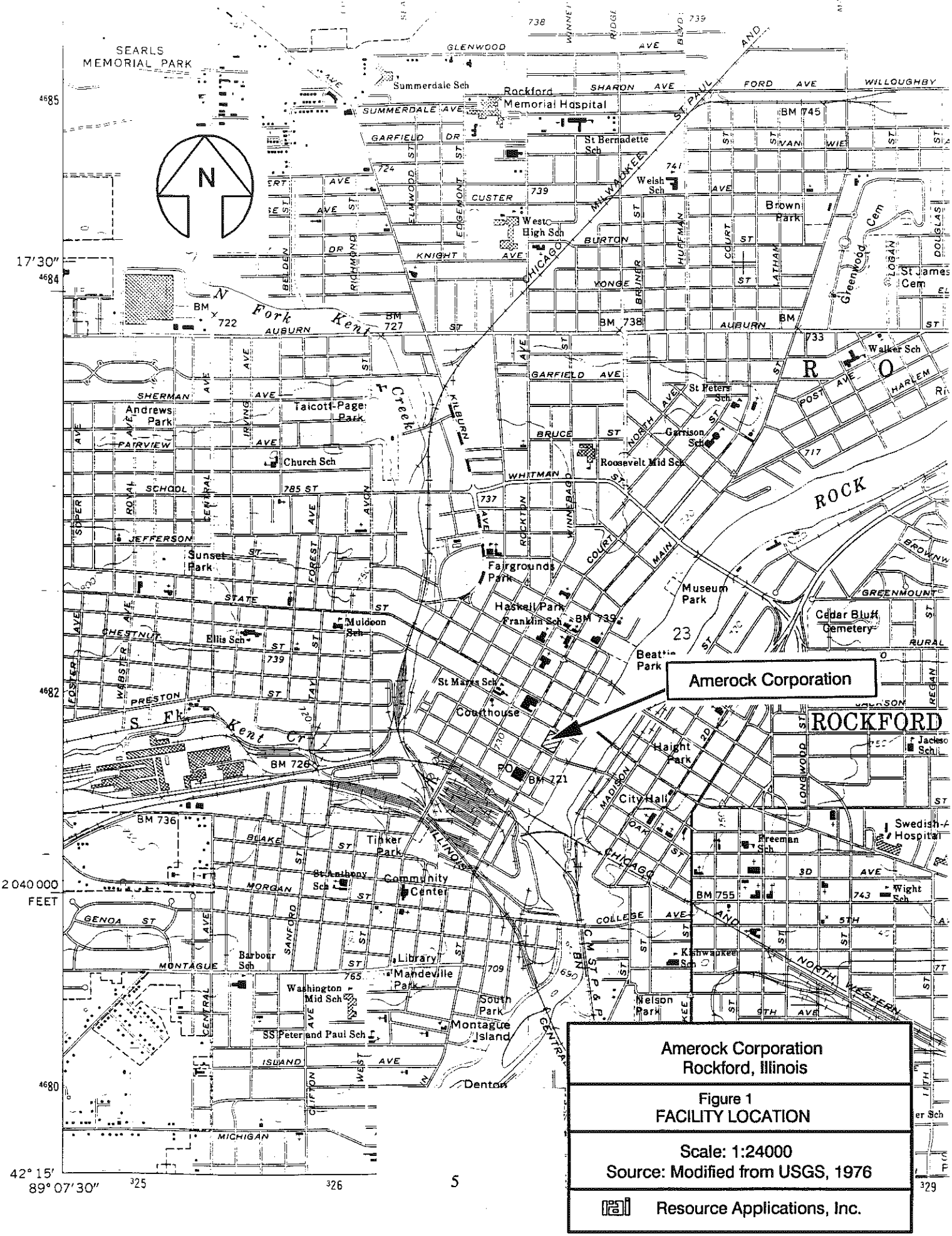
The Amerock facility is bordered on the north and south by commercial businesses, on the west by commercial businesses and residential areas, and on the east by the Rock River and then residential areas beyond the river.

2.2 FACILITY OPERATIONS

The Amerock facility assembles window hardware with operations including: parts cleaning, phosphating, chromating, painting, and lacquering. The type of metal (brass, steel, or zinc) for the window hardware determines if it is to be treated in a phosphate or chromate bath process. The hardware is then rinsed and conveyed to dryers. Next, the hardware is painted in electrostatic paint booths and then dried in an oven. The window hardware is then stored inside the building.

The facility has operated at its current location since 1929 and employs about 350 people. The facility consists of one 13-story building occupying 24,180 square feet. The phosphating, chromating, and painting processes are performed on the sixth floor. The facility layout of the sixth floor is shown in Figure 2. The shipping and receiving area and the Waste Oil Drum Storage Area (SWMU 3) is located on the second floor, as shown in Figure 3. General maintenance is done on the first floor. The facility layout of the first floor is shown in Figure 4.

Wastes that are generated from the chromate bath process and the painting process are accumulated on the sixth floor. Methyl ethyl ketone (MEK) is accumulated in a 5-gallon pan (SWMU 1) in the paint spray booths located southwest of the chromate bath process. Waste chromate is accumulated in a 55-gallon drum (SWMU 1). Both waste MEK and waste chromate are then stored

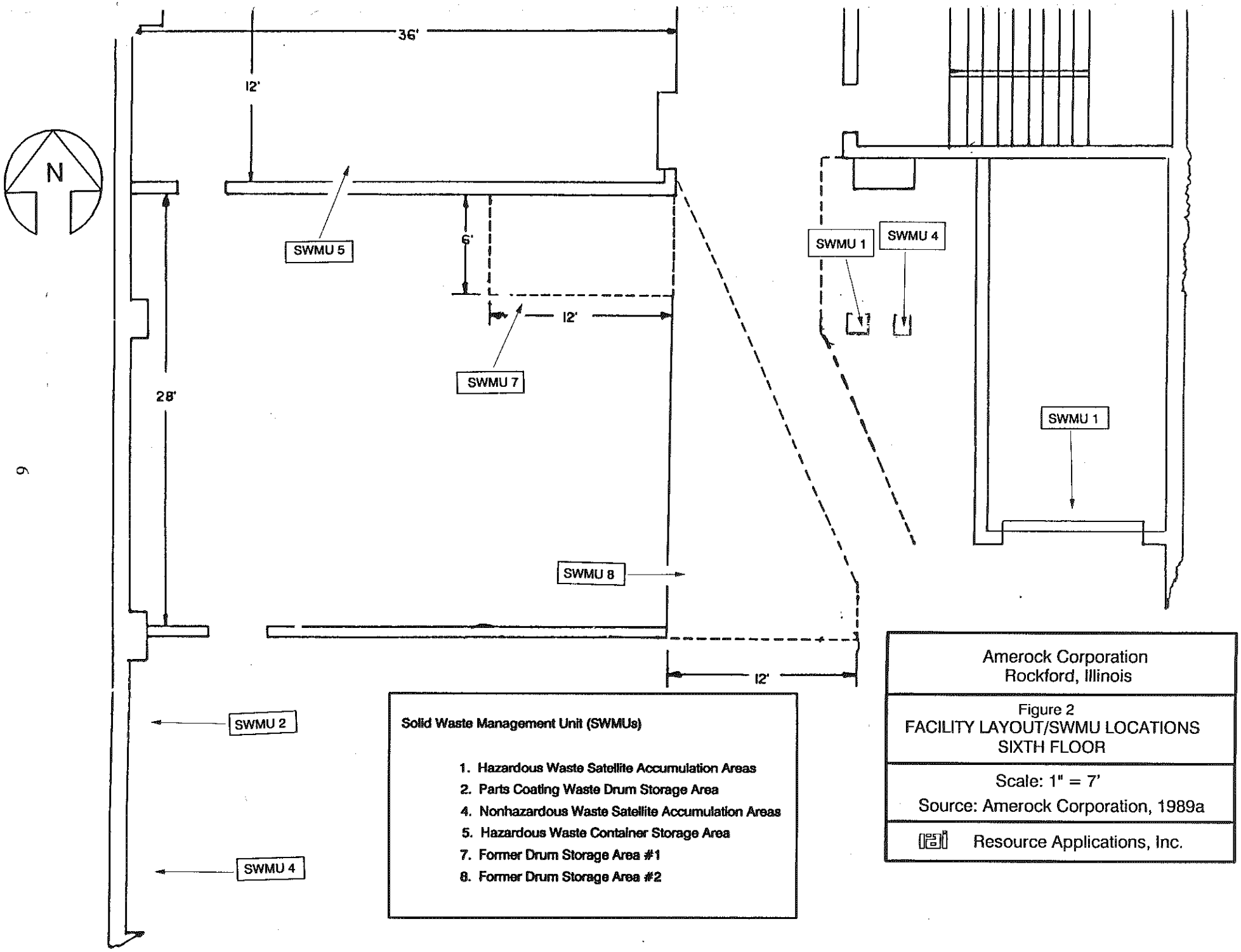


Amerock Corporation
Rockford, Illinois

Figure 1
FACILITY LOCATION

Scale: 1:24000
Source: Modified from USGS, 1976

Resource Applications, Inc.



Solid Waste Management Unit (SWMUs)

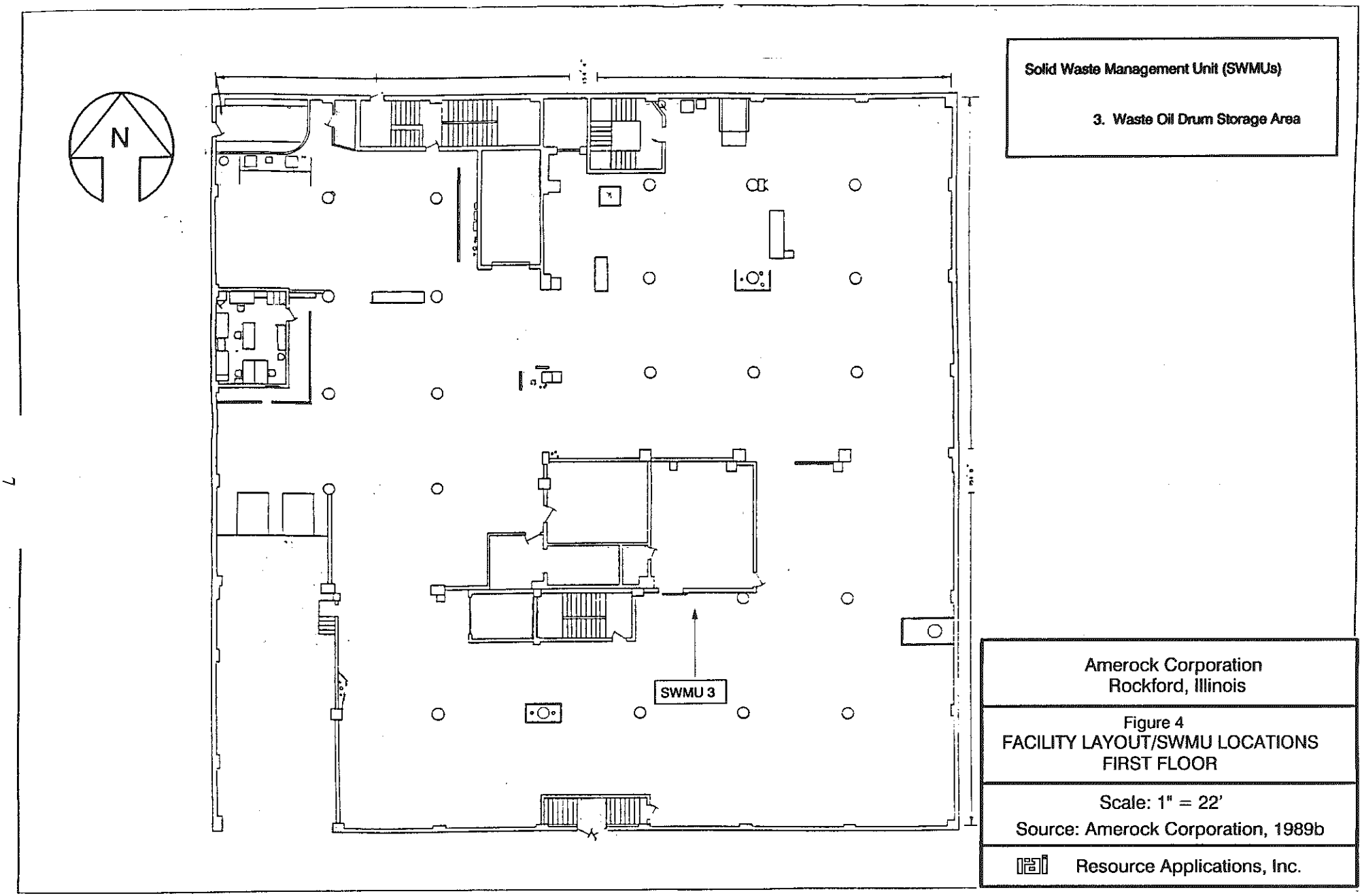
1. Hazardous Waste Satellite Accumulation Areas
2. Parts Coating Waste Drum Storage Area
4. Nonhazardous Waste Satellite Accumulation Areas
5. Hazardous Waste Container Storage Area
7. Former Drum Storage Area #1
8. Former Drum Storage Area #2

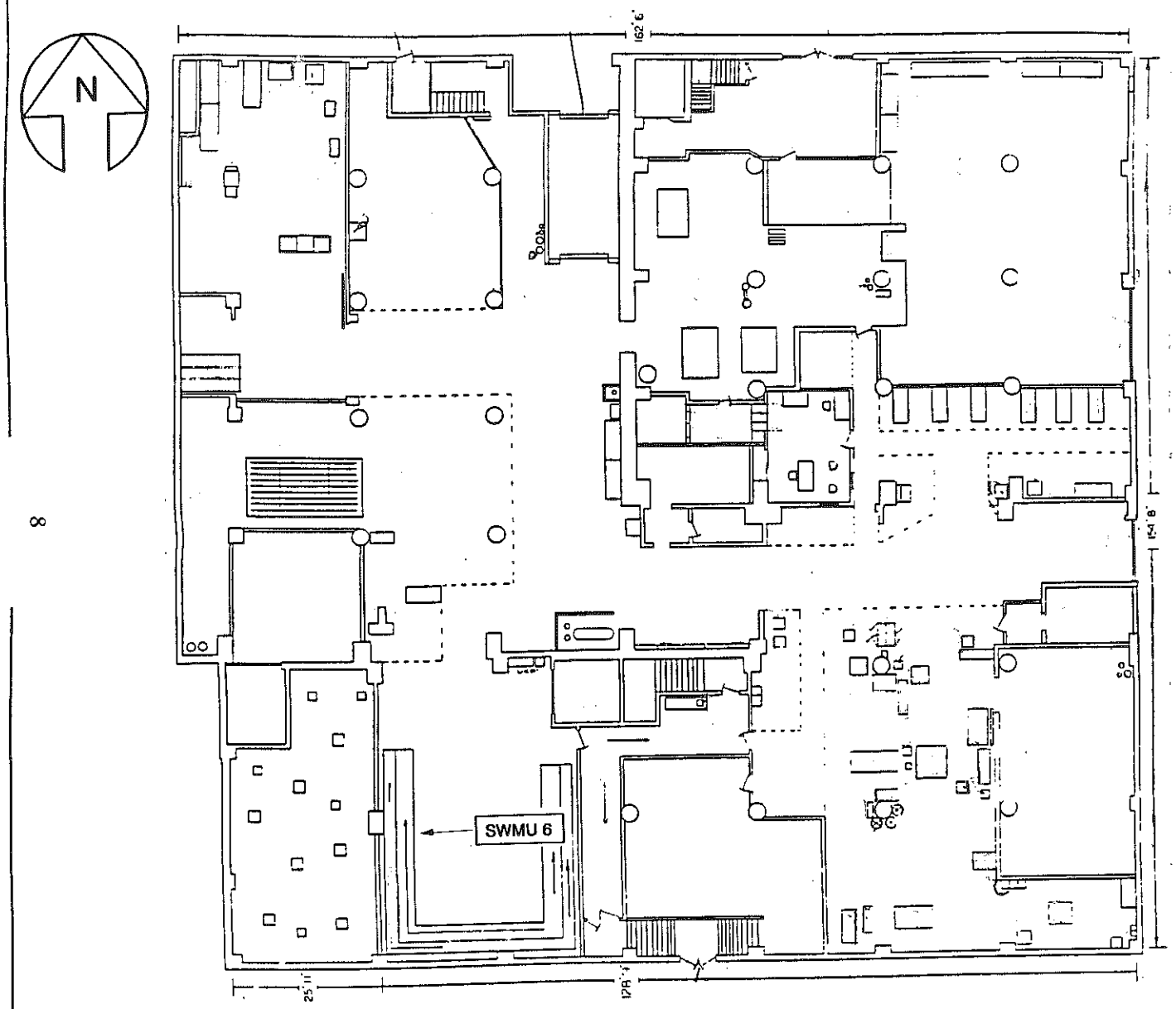
Amerock Corporation
Rockford, Illinois

Figure 2
FACILITY LAYOUT/SWMU LOCATIONS
SIXTH FLOOR

Scale: 1" = 7'
Source: Amerock Corporation, 1989a

Resource Applications, Inc.


N
Solid Waste Management Unit (SWMUs)
3. Waste Oil Drum Storage Area
SWMU 3
Amerock Corporation
Rockford, Illinois
Figure 4
FACILITY LAYOUT/SWMU LOCATIONS
FIRST FLOOR
Scale: 1" = 22'
Source: Amerock Corporation, 1989b
Resource Applications, Inc.



Solid Waste Management Unit (SWMUs)

6. Spent Battery Storage Area

Amerock Corporation
Rockford, Illinois

Figure 3
FACILITY LAYOUT/SWMU LOCATIONS
SECOND FLOOR

Scale: 1" = 22'

Source: Amerock Corporation, 1989b

Resource Applications, Inc.

in the Hazardous Waste Container Storage Area (SWMU 5). Nonhazardous phosphate waste generated from the phosphate bath process, and nonhazardous ash generated from the burn-off oven are accumulated in satellite areas on the sixth floor in Nonhazardous Waste Satellite Accumulation Areas (SWMU 4). The walls of the paint spray booths are coated with a special paint that peels. Overspray from the painting process is peeled off the walls of the paint spray booths and stored in 55-gallon drums. A vent system pulls the air from the paint spray booths through filters. The waste filters are removed and disposed of with the peeled-off paint and ash. All three wastes are stored in the Parts Coating Waste Drum Storage Area (SWMU 2). Waste oil from machines is stored on the second floor in the Waste Oil Drum Storage Area (SWMU 3). Spent forklift batteries are stored on the first floor in the Spent Battery Storage Area (SWMU 6). Facility SWMUS are identified in Table 1.

In 1929, Amerock operated out of the 13th floor of the 416 South Main Street Building. Eventually, in the 1960's, Amerock purchased the building and occupied all floors. In 1987, the Newell Group purchased Amerock, which became a subsidiary to them. Past operations at the plant included electroplating, molding, zinc die casting of parts, and stamping of steel parts. These operations were moved to another Amerock plant on Auburn Street in Rockford in 1976. The facility also used to clean parts with stoddard solvents; this process ceased in 1989.

2.3 WASTE GENERATING PROCESSES

The primary waste streams generated at the Amerock facility are spent MEK (F005), spent chromic acid (D002, D007), chromate sludge (D002, D007), waste phosphate and cleaner, parts coating waste, waste oil, and spent batteries. These wastes are generated during the cleaning, phosphating, chromating, and painting of window hardware. Waste oil is generated from maintenance of the assembly and riveting machines. The spent batteries are removed from the forklifts. Wastes generated at the facility are discussed below and are summarized in Table 2. Annual generation rates presented are based on 1990 and 1991 waste generation data.

Cleaning of the electrostatic paint booths' disks and lines generates approximately 400 gallons of spent MEK (F005) annually. This waste is accumulated in Hazardous Waste Satellite Accumulation Areas (SWMU 1).

Zinc parts are dipped in a chromate bath after being cleaned and rinsed. This process generates liquid and solid chromate waste. Every 5 months the liquid is decanted into a 55-gallon drum and accumulated in SWMU 1. Approximately 1,045 gallons of liquid chromate waste is generated annually.

TABLE 1

SOLID WASTE MANAGEMENT UNITS (SWMU)

SWMU Number	SWMU Name	RCRA Hazardous Waste Management Unit*	Status
1	Hazardous Waste Satellite Accumulation Areas	No	Active
2	Parts Coating Waste Drum Storage Area	No	Active
3	Waste Oil Drum Storage Area	No	Active
4	Nonhazardous Waste Satellite Accumulation Areas	No	Active
5	Hazardous Waste Container Storage Area	Yes	Active, less than 90 day storage; RCRA closure of greater than 90-day storage completed in 1989
6	Spent Battery Storage Area	No	Active
7	Former Drum Storage Area #1	Yes	Inactive, RCRA closure completed in 1989
8	Former Drum Storage Area #2	Yes	Inactive, RCRA closure completed in 1989

Note:

* A RCRA hazardous waste management unit is one that currently requires or formerly required submittal of a RCRA Part A or Part B permit.

TABLE 2

SOLID WASTES

Waste/EPA Waste Code	Source	Primary Management Unit*
MEK/F005	Electrostatic Paint Booths	SWMUs 1, 5
Chromic Acid Solution and Chromate Sludge/D002, D007	Chromating Zinc Parts	SWMUs 1, 5, 8
Spent Alkaline Cleaner /D002	Cleaning and Phosphate Bath Process	SWMU 7
Waste Paint/F005	Electrostatic Paint Booths	SWMU 7
Phosphoric Acid/D002	Phosphate Bath Process	SWMU 8
Phosphate and Cleaner Waste/NA	Cleaning and Phosphate Bath Process	SWMUs 4, 2
Burn-Off Oven Ash/NA	Burn-Off Oven	SWMUs 4, 2
Paint Filters/NA	Electrostatic Paint Booths	SWMU 2
Peel-Off Paint/NA	Electrostatic Paint Booths	SWMU 2
Waste Oil/NA	Assembly and Riveting Machines	SWMU 3
Spent Batteries/NA	Truck Lifts	SWMU 6

Note:

* Primary management unit refers to a SWMU that currently manages or formerly managed the waste. NA (Not Applicable) means that the waste is nonhazardous.

The chromate waste is stored in the Hazardous Waste Container Storage Area (SWMU 5) and transported off-site to the Auburn Street plant to recover the zinc. After the zinc has been reclaimed, the waste chromate liquid (D002, D007) is transported off-site and treated by FIW Laidlaw Environmental. Waste chromate sludge (D002, D007) is pumped into a 55-gallon drum and accumulated in SWMU 1. Approximately 20-25 gallons of waste chromate sludge is generated annually. The sludge is also transported to the Auburn plant to recover the zinc. The chromate sludge is then disposed of by Chemical Waste Management of Alsip, Illinois. Prior to 1987, waste chromate sludge (D002, D007) was stored in Former Drum Storage Area #2 (SWMU 8).

Nonhazardous phosphate waste is generated when the phosphate bath is cleaned. This is done every 6 months to 1 year. When the heating coils do not heat properly, the phosphate liquid is neutralized with sodium hydroxide to a pH of seven to 11 and dumped into the sewer. The coils are then descaled and rinsed into the sewer. Large, hard chunks of solid phosphate waste is accumulated in drums in Nonhazardous Waste Satellite Accumulation Areas (SWMU 4). Approximately 55 gallons of solid phosphate waste is generated annually. Chemical Waste Management of Alsip, Illinois disposes of this waste.

Mixed with the phosphate waste is the cleaner used to clean the window hardware before the chromate/phosphate bath process. Once a week, the cleaner is dumped from the tank into the sewer. The large chunks are accumulated with the phosphate waste in Nonhazardous Waste Satellite Accumulation Areas (SWMU 4). Phosphating of brass window hardware was eliminated as a process at the Amerock facility in December 1991. However, brass hardware is still cleaned and sent to lacquering.

Wastewater generated from the rinsing of the window hardware before, and after, the chromate or phosphate bath process is discharged into the sewer system. Amerock is not required by the Rockford Sanitary District to have a permit to dump wastewater into the sewer system. Amerock does monitor its wastewater daily for chromium and zinc levels.

Nonhazardous ash from the burn-off oven is accumulated in a Nonhazardous Waste Satellite Accumulation Area (SWMU 4) that is connected to the oven. The ash is then shovelled into 55-gallon drums and stored in the Parts Cleaning Waste Drum Storage Area (SWMU 2). Two other wastes are considered parts coating waste: the filters from the paint spray booths and the overspray on the walls of the paint booths. During the VSI, facility representatives stated that the filters passed Toxicity Characteristic Leaching Procedure (TCLP) testing and are manifested out as special waste. The walls of the paint spray booth are coated with a special paint that peels. Overspray from the paint sprayers is

then peeled off the walls and stored in 55-gallon drums in the Parts Coating Waste Drum Storage Area (SWMU 2). In 1991, 15 cubic yards of parts coating waste was generated and transported by Areas Disposal Inc. to Clinton Landfill in Clinton, Illinois. Waste oil is generated from the maintenance of the assembly and riveting machines. Waste oil is stored in the Waste Oil Drum Storage Area (SWMU 3) on the second floor. About 270 gallons of waste oil was generated in 1990 and transported by Beaver Oil Co. of Chicago, Illinois.

On the first floor, the spent batteries used for the lift trucks are stored in the Spent Battery Storage Area (SWMU 6) until they are picked up by the Battery Shop of Milwaukee, Wisconsin. In 1990, two batteries were picked up.

In the past, three drum storage units stored hazardous waste for greater than 90 days. The three drum storage units (SWMUs 5, 7, and 8) went through RCRA closure in 1989. Currently SWMU 5 stores hazardous waste for less than 90 days. The Former Drum Storage Area #1 (SWMU 7) used to store spent alkaline cleaner (D002) and waste paint (F005). Former Drum Storage Area #2 (SWMU 8) stored chromic acid solution (D002, D007) and phosphoric acid solution (D002).

2.4 HISTORY OF DOCUMENTED RELEASES

There is no history of documented releases at this facility.

2.5 REGULATORY HISTORY

Amerock submitted a Notification of Hazardous Waste Activity to EPA on August 12, 1980. The facility submitted a RCRA Part A permit application to EPA in November 1980. This application listed the following process code and capacity: a drum storage unit (S01) with a 1,210-gallon capacity. The application listed the following waste codes: F017, D002, and D004 (Amerock, 1980). An amended Part A permit was submitted to EPA on April 23, 1987. The following waste codes were listed D002/D007 and D002 (Amerock, 1987).

The facility has closed the following units: Hazardous Waste Container Storage Area (SWMU 5), the Former Drum Storage Area #1, (SWMU 7) and the Former Drum Storage Area #2 (SWMU 8). All three went through RCRA closure in 1989 (IEPA, 1989d). The facility currently operates as a small-quantity generator, storing wastes for less than 90 days.

In the past, Amerock has had RCRA compliance problems. Numerous inspections have been performed by IEPA at this facility. Amerock has had problems with its contingency plan and other paperwork violations (IEPA, 1982, 1988a, 1988b). On March 21, 1988, Amerock was sent a Compliance Inquiry Letter (CIL) by IEPA for the violation of using coating material with a VOC content above the 3.5 pound-per-gallon limit (IEPA, 1988a). In 1989, Amerock was sent a Pre-Enforcement Conference Letter for violations concerning storing and labeling of waste, and paperwork problems concerning the contingency plan (IEPA, 1989a). Amerock resolved most of its violations before IEPA performed a follow-up inspection in February 1989 (IEPA, 1989b). The rest of the violations were resolved in April 1989 (IEPA, 1989c). In November 1989, the Amerock Facility was inspected by IEPA to verify closure of storage facilities (IEPA, 1989d). Amerock received an IEPA closure certification letter on November 27, 1989 (IEPA, 1989e).

The facility is not required to have air permits and there is no history of odor complaints. The facility has a National Pollutant Discharge Elimination System (NPDES) permit. The NPDES permit is for run-off from the roof of the building.

2.6 ENVIRONMENTAL SETTING

This section describes the climate, flood plain and surface water, geology and soils, and ground water in the vicinity of the Amerock facility.

2.6.1 Climate

The site is located in Rockford, Illinois in Winnebago County. Rockford is the location of the nearest U.S. National Weather Service office. With no significant topographical barriers to the airmass flow, the climate in the area is typically continental with cold winters; warm summers; and frequent short periodic fluctuations in the temperature, humidity, cloudiness, and wind direction (Ruffner and Bair, 1985). The average daily temperature is 47.8°F. The lowest average daily minimum temperature is 9.8°F in January. The highest average daily maximum temperature is 91.9°F in August. The prevailing wind direction is west-southwest and the average wind speed is 9.9 miles per hour. Average annual net precipitation is 5.44 inches. In winter, about one half of the precipitation, or 10 percent of the annual total, falls as snow. During the fall, winter, and spring, the pattern of precipitation tends to be more uniform over both time and distance, whereas in summer rainfall is often locally heavy and variable. The one year, 24-hour maximum rainfall recorded in the area over the last 25 years is 5.56 inches (Ruffner, 1985).

2.6.2 Flood Plain and Surface Water

The general direction of surface flow is toward the Rock River which lies immediately east of the facility and flows from north to south. The terrain has a slope of about 40 feet over a distance of 0.8 mile, providing effective relief for surface runoff. The facility locale is classified as a Zone A flood plain, that is, an area with a greater than 1 percent probability of flooding in any given year (FEMA, 1982).

2.6.3 Geology and Soils

Winnebago County is characterized by broad, rolling glaciated uplands that rise 100 to 200 feet above the valleys. The bedrock along the Rock River in the Rockford area lies buried beneath glacial deposits that are up to 300 feet thick (Anderson, 1967). These glacial deposits consist of sorted sand and gravel, with some finer material, and are known as valley train deposits (Berg, et al., 1984; Hackett and Bergstrom, 1956). The area's drainage characteristics are well graded so that surface water drains to edges of lots and finally into the storm water drainage system. As a result of construction, the water carrying capacity and permeability of the soil varies and is generally considered low to moderate. Runoff is considered moderate to high because of the steep slopes and the proximity of the Rock River.

The sand and gravel deposits in the Rock River Valley near the site are approximately 150 feet thick. The bedrock units underlying the glacial drift are marine sandstones, shales and dolomites, with an approximate total thickness of 2,000 feet. These rocks were deposited in the interval 520 to 400 million years ago, during the Cambrian, Ordovician and Silurian periods of the Paleozoic Era. The uppermost bedrock units in the vicinity of the facility are dolomites of the Galena-Platteville Formation, and these are underlain by the Glenwood-St. Peter Sandstones.

2.6.4 Ground Water

In northern Illinois ground water resources are available from four major aquifers, including: (1) sand and gravel aquifers in the glacial drift; (2) the dolomite aquifers, consisting of the Galena and Platteville Dolomite groups; (3) sandstone aquifers consisting of the Glenwood-St. Peter and Ironton-Galesville Sandstones; and, (4) the deeper Mt. Simon aquifers, consisting of the Mt. Simon Sandstones of the Eau Claire Formation (Berg, et al., 1984). In the site vicinity, excellent sand and gravel aquifers

occur. Municipal and industrial supplies are obtained from up to 150 feet of coarse sand and gravel (Hackett and Bergstrom, 1956).

The Galena-Platteville Dolomite group constitutes the uppermost bedrock in Winnebago County, and is probably the most widely used bedrock aquifer for domestic supplies, although the deeper sandstones are the most dependable source for large quantities of ground water. Because of their widespread distribution, consistent water yielding zones and shallow position, the dolomites provide water to most of the wells through joints and fractures close to the land surface. The average thickness of drift over the dolomite is 30 feet and the average depth of wells is 104 feet. Reported well yields range from 5 to 40 gallons per minute (gpm) with an average yield of 20 gpm. Penetration into dolomite from about 20 to 100 feet yields satisfactory water supplies. Where the drift cover is relatively thin, dolomite aquifers are very sensitive to contamination because water moves through the joints and fractures and there is little opportunity for filtration through granular materials (Berg, et al., 1984). In close proximity to the Rock River, the drift deposits are underlain directly by the St. Peter Sandstones, due to removal of the dolomites by erosion.

The St. Peter, Ironton-Galesville and the Elmhurst-Mt. Simon Sandstones furnish large quantities of water. Deeper aquifers are used only for larger municipal and industrial water supplies. The St. Peter Sandstone, the shallowest of the three aquifers, is used for domestic ground water supplies and is present at a depth of approximately 150 feet below the land surface near the site (Berg, et al., 1984). The general flow of ground water is from west to east towards the Rock River.

2.7 RECEPTORS

The Amerock facility occupies 0.5 acre in a light-industrial and mixed-use area in Rockford, Illinois. Rockford has a population of about 142,000.

The Amerock facility is bordered on the north and south by commercial businesses, on the west by commercial businesses and residential areas, and on the east by the Rock River and then residential areas beyond the river. The nearest school, St. Mary's, is located about 1 mile northwest of the facility. Facility access is controlled by a 24-hour guard security. There are two locked entrances to the building. Employees must use key cards to gain admittance.

The nearest surface water body, the Rock River, is located 1 block east of the facility and is used for recreational purposes.

Ground water is used for drinking and municipal water supply. The nearest drinking water wells are located 3 miles south of the facility. Unit well No. 4, located at 801 Marchesano Drive, is the closest drinking water well to the Amerock facility.

No sensitive environments or wetlands are located on-site, or within a 2-mile radius of the facility.

3.0 SOLID WASTE MANAGEMENT UNITS

This section describes the eight SWMUs identified during the PA/VSI. The following information is presented for each SWMU: description of the unit, dates of operation, wastes managed, release controls, history of documented releases, and RAI observations.

SWMU 1	**Hazardous Waste Satellite Accumulation Areas**
Unit Description:	The Hazardous Waste Satellite Accumulation Areas are located on the sixth floor in the northeast and southeast corners. The area in the northeast corner accumulates waste chromate (D002, D007) in steel 55-gallon drums. The area is a 2-foot by 6-foot concrete area (see Photos 1 and 2). The area in the southeast corner is a 5-gallon pan that accumulates waste MEK (F005).
Date of Startup:	This unit began operation in 1991.
Date of Closure:	This unit is active.
Wastes Managed:	This unit manages waste chromate sludge (D002, D007), waste chromate liquid (D002, D007), and waste MEK (F005) in containers. Waste chromate from this unit is ultimately stored in SWMU 5 and then transported to the Auburn plant for zinc reclamation. Liquid waste is transported by FIW for disposal. The chromate sludge is also transported to the Auburn plant for zinc reclamation; it is then disposed of by Chemical Waste Management of Alsip, Illinois. Waste MEK (F005) is stored in SWMU 5 and transported off-site by Hydrite Chemical Co. and disposed of by Avganics Industries, Inc. of Cottage Grove, Wisconsin.
Release Controls:	The unit sits on a concrete floor and all floor drains are plugged.
History of Documented Releases:	No releases from this unit have been documented.

Observations:	The area in the northeast corner contained two 55-gallon drums during the VSI. One drum was nearly empty and the other drum was half full. There were no cracks in the floor and the drums were properly sealed. The area in the southeast corner contained one 5-gallon pan. No evidence of release was noted.
SWMU 2	**Parts Coating Waste Drum Storage Area**
Unit Description:	The Parts Coating Waste Drum Storage Area is located on the west side of the sixth floor of the building. The unit stores parts coating waste until it is shipped off-site for disposal. The area measures 10 feet by 20 feet. The unit is made of concrete with a berm sloping to the south (see Photo 7).
Date of Startup:	This unit began operation around 1980.
Date of Closure:	The unit is active.
Wastes Managed:	This unit manages nonhazardous parts coating waste which consists of: ash from the oven, used paint filters, and peel-off paint from paint spray booths in containers. Wastes from this unit are ultimately transported by Areas Disposal Inc. to Clinton Landfill in Clinton, Illinois.
Release Controls:	This unit sits on concrete with a berm sloping up to the south. All floor drains are plugged in the building.
History of Documented Releases:	No releases from this unit have been documented.
Observations:	The unit contained approximately twenty-three 55-gallon drums during the VSI. All drums were properly sealed and no cracks in the pavement were visible. No evidence of release was noted.

SWMU 3	**Waste Oil Drum Storage Area**
Unit Description:	The Waste Oil Drum Storage Area is located on the second floor of the building and is used to store waste oil. The area measures 21 feet by 26 feet. The unit is made of a concrete floor with a plugged drain in the center (see Photos 9 and 10).
Date of Startup:	This unit began operation around 1970.
Date of Closure:	The unit is active.
Wastes Managed:	This unit manages nonhazardous waste oil from the assembly and riveting machines. Wastes from this unit are ultimately picked up for disposal by Beaver Oil Co. in Chicago, Illinois.
Release Controls:	The unit has a concrete floor with a plugged drain in the center of the room.
History of Documented Releases:	No releases from this unit have been documented.
Observations:	The unit contained nine 55-gallon drums during the VSI. Three of the drums were open and accumulating waste oil. The rest of the drums were properly sealed. There was a pool of waste oil in the center of the room above the plugged drain.
SWMU 4	**Nonhazardous Waste Satellite Accumulation Areas**
Unit Description:	The Nonhazardous Waste Satellite Accumulation Areas are located on the sixth floor of the building. The areas accumulate nonhazardous ash, phosphate waste, and cleaner waste. The ash area measures 2 feet by 4 feet. The phosphate and cleaner area measures 2 feet by 6 feet. The ash area is made of metal and is part of the oven. The phosphate and cleaner area has a concrete floor where the steel drums accumulate waste (see Photos 2 and 3).

Date of Startup:	This unit began operation around 1980.
Date of Closure:	The unit is active.
Wastes Managed:	This unit manages ash from the burn-off oven, phosphate waste, and cleaner waste. Wastes from this unit are ultimately stored in the Parts Coating Waste Drum Storage Area (SWMU 2) and disposed of at the Clinton Landfill in Clinton, Illinois.
Release Controls:	The floor is made of concrete with all drains plugged.
History of Documented Releases:	No releases from this unit have been documented.
Observations:	The ash unit contained one tray of ash during the VSI. The phosphate and cleaner unit contained two 55-gallon drums. No cracks in the floor were visible. Drums were properly sealed. No evidence of release was noted.
SWMU 5	**Hazardous Waste Container Storage Area**
Unit Description:	The Hazardous Waste Container Storage Area is located on the sixth floor of the building and measures 12 feet by 36 feet. The unit is made of a concrete floor that has a berm near the entrance of the room. The room is kept closed. The unit underwent formal RCRA closure for storing hazardous wastes for greater than 90 days (see Photo 6).
Date of Startup:	This unit began operation prior to 1980.
Date of Closure:	The unit underwent RCRA closure in 1989. The unit currently stores waste for less than 90 days.
Wastes Managed:	This unit currently manages hazardous waste MEK (F005), chromate waste (D002, D007), and product paint. Wastes from this unit are ultimately disposed of by Chemical Waste Management of Alsip, Illinois.

Release Controls:	No floor drains are in the area. A berm is located at the entrance of the room. There are no visible cracks in the floor.
History of Documented Releases:	No releases from this unit have been documented.
Observations:	During the VSI, numerous product paint containers and many 55-gallon drums were observed in the area. There was some staining on the floor of the unit.
SWMU 6	**Spent Battery Storage Area**
Unit Description:	The Spent Battery Storage Area is located on the first floor of the building. The unit stores spent batteries and measures 2 feet by 15 feet. The unit is made of a wood block floor with creosote poured over it (see Photo 8).
Date of Startup:	The unit began operation in 1982.
Date of Closure:	This unit is active.
Wastes Managed:	This unit manages spent batteries. Wastes from this unit are ultimately picked up by the Battery Shop of Milwaukee, Wisconsin.
Release Controls:	No floor drains are in the area. Batteries are placed on wood skids.
History of Documented Releases:	No releases from this unit have been documented.
Observations:	At the time of the VSI, the area contained four batteries stored on wooden skids waiting to be recharged. No evidence of release ws noted.
SWMU 7	**Former Drum Storage Area #1**
Unit Description:	The Former Drum Storage Area was located on the sixth floor of the building. The unit formerly stored spent alkaline cleaner (D002) and waste paint (F005) for greater than 90 days. The unit measures 12 feet

	by 36 feet and occupied a corner of the room. The unit has a concrete floor (see Photo 5).
Date of Startup:	The unit began operation prior to 1980.
Date of Closure:	The unit has been inactive since 1987, and was formally RCRA closed in 1989.
Wastes Managed:	This unit managed spent alkaline cleaner (D002) and waste paint (F005) in containers.
Release Controls:	This unit is closed.
History of Documented Releases:	No releases from this unit have been documented.
Observations:	The unit contained nothing. No evidence of release was noted.
SWMU 8	**Former Drum Storage Area #2**
Unit Description:	The Former Drum Storage Area was located on the sixth floor of the building. The unit formerly stored chromic acid (D002, D007), and phosphoric acid (D002), in 55-gallon steel drums for greater than 90 days. The unit measures 28 feet by 12 feet triangular area. The unit consisted of a concrete floor (see Photo 4).
Date of Startup:	This unit began operation prior to 1980.
Date of Closure:	This unit has been inactive since 1987, and was formally RCRA closed in 1989.
Wastes Managed:	The unit managed chromic acid (D002, D007) and phosphoric acid (D002) in containers.
Release Controls:	This unit is closed.

History of Documented Releases:	No releases from this SWMU have been documented.
Observations:	The unit contained empty drums and about ten rolls of paper. No evidence of a release was noted.

4.0 AREAS OF CONCERN

RAI did not identify any AOCs during the PA/VSI. All storage areas have sound containment and the facility has no documented release history.

5.0 CONCLUSIONS AND RECOMMENDATIONS

The PA/VSI identified eight SWMUs at the Amerock facility. Background information on the facility's location, operations, waste generating processes, history of documented releases, regulatory history, environmental setting, and receptors is presented in Section 2.0. SWMU-specific information, such as the unit's description, dates of operation, wastes managed, release controls, history of documented releases, and observed condition, is discussed in Section 3.0. AOCs are discussed in Section 4.0. Following are RAI's conclusions and recommendations for each SWMU. Table 3 identifies the SWMUs at the Amerock facility and suggested further actions.

SWMU 1 **Hazardous Waste Satellite Accumulation Areas**

Conclusions: The areas are located within the facility building and accumulate waste chromate (D002, D007) and spent MEK (F005).

The unit has a low potential for release to ground water, surface water, air, and on-site soil. All the drains are plugged in the building. Any release would have to travel six stories to reach ground water, surface water, and on-site soil. Drums are properly sealed, so the release potential to air is low.

Recommendations: RAI recommends no further action at this time.

SWMU 2 **Parts Coating Waste Drum Storage Area**

Conclusions: This unit currently stores special waste in 55-gallon drums on the sixth floor of the building.

The unit has a low potential for release to ground water, surface water, air, and on-site soil. All floor drains are plugged in the building. Any release would have to travel six stories to reach ground water, surface water and on-site soil. Drums are properly sealed, so release potential to air is low.

Recommendations: RAI recommends no further action at this time.

TABLE 3

SWMU SUMMARY

SWMU	Operational Dates	Evidence of Release	Suggested Further Action
1. Hazardous Waste Accumulation Areas	1991 to present	None	No further action at this time
2. Parts Coating Waste Drum Storage Area	1980 to present	None	No further action at this time
3. Waste Oil Drum Storage Area	1970 to present	Waste oil pooled in center of room.	Clean up pooled oil around drain
4. Nonhazardous Waste Satellite Accumulation Areas	1980 to present	None	No further action at this time
5. Hazardous Waste Container Storage Area	Prior to 1980 (RCRA Regulated) 1987 to present (not RCRA Regulated)	Staining on floor.	No further action at this time
6. Spent Battery Storage Area	1982 to present	None	No further action at this time
7. Former Drum Storage Area #1	Prior to 1980	None	No further action at this time
8. Former Drum Storage Area #2	Prior to 1980	None	No further action at this time

SWMU 3 Waste Oil Drum Storage Area

Conclusions: This unit stores waste oil in 55-gallon drums in a 21-foot by 26-foot room on the second floor with a plugged floor drain in the center.

The unit has a low potential for release for ground water, surface water, air, and on-site soils. Any release would have to travel two stories to reach ground water, surface water, and on-site soil. Drums are properly sealed, so the release potential to air is low.

Recommendations: RAI recommends that released waste oil that accumulates around the plugged floor drain be cleaned up.

SWMU 4 Nonhazardous Waste Satellite Accumulation Areas

Conclusions: This unit is indoors and accumulates burn-off oven ash, phosphate, and cleaner waste on the sixth floor of the building.

The unit is indoors and has a low potential for release to ground water, surface water, air, and on-site soil. The ash is contained in a tray and the phosphate cleaner waste is stored in closed 55-gallon drums, so the release potential to air is low.

Recommendations: RAI recommends that no further action be taken at this time.

SWMU 5 Hazardous Waste Container Storage Area

Conclusions: This unit stores hazardous waste for less than 90 days on the sixth floor. The unit has a concrete floor with a berm at the entrance of the room. The room is kept closed by a metal door.

The unit has a low potential for release to ground water, surface water, air, and on-site soil. The unit is kept closed and any release would be contained by the berm at the entrance of the room. A release would have to travel six floors to

reach on-site soil, ground water, or surface water. Drums and containers are properly sealed, so the release potential to air is low.

Recommendations: RAI recommends no further action at this time.

SWMU 6 **Spent Battery Storage Area**

Conclusions: This unit is located on the first floor, in the shipping and receiving area. The batteries are stored on wooden skids.

The unit has a low potential for release to ground water, surface water, air, and on-site soil. The floor is made of wood block with creosote poured over it. The surface appeared sound.

Recommendations: RAI recommends no further action at this time.

SWMU 7 **Former Drum Storage Area #1**

Conclusions: This unit went through RCRA closure in 1989. The unit previously stored hazardous waste for greater than 90 days.

The unit has a low potential for release to ground water, surface water, air, and on-site soil. The unit has not stored any product or waste since closure.

Recommendations: RAI recommends no further action at this time.

SWMU 8 **Former Drum Storage Area #2**

Conclusions: This unit went through RCRA closure in 1989. The unit previously stored hazardous wastes for greater than 90 days.

The unit has a low potential for release to ground water, surface water, air, and on-site soil. The unit currently stores empty drums and rolls of paper.

Recommendations: RAI recommends no further action at this time.

REFERENCES

Anderson, R.C., 1967. "Sand and Gravel Resources along the Rock River in Illinois", Illinois State Geological Survey Circular 414, Urbana, Illinois.

Amerock Corporation (Amerock), 1980. RCRA Part A permit application, November.

Amerock, 1987. Subsequent RCRA Part A permit application, April 23.

Amerock, 1989a. Revised Closure Plan for Amerock's South Main Plaint, January 3.

Amerock, 1989b. Revision of Compliance Plan, February 24.

Berg, R.C., J.P. Kempton, and A.N. Stecyk, 1984. "Geology for Planning in Boone and Winnebago Counties", Illinois State Geological Survey Circular 531, Urbana, Illinois.

Federal Emergency Management Agency (FEMA), 1982. National Flood Insurance Program, City of Rockford, Illinois, Winnebago County. Community - panel number 170723 0016 B. Map revised June 18.

Hackett, J.E. and R.E. Bergstrom, 1956. "Groundwater in Northwestern Illinois", Illinois State Geological Survey Circular 207, Urbana, Illinois.

Illinois Environmental Protection Agency (IEPA), 1982. Inspection by IEPA, September 9.

IEPA, 1988a. Compliance Inquiry Letter, March 21.

IEPA, 1988b. Routine ISS Inspection by IEPA, February 22.

IEPA, 1989a. Pre-Enforcement Conference Letter, January 23.

IEPA, 1989b. Follow-Up Inspection by IEPA, February 22.

IEPA, 1989c. Resolved Violations, April 4.

IEPA, 1989d. Closure Verification Inspection by IEPA, November 21.

IEPA, 1989e. Closure Verification Letter, November 27.

Ruffner, J.A. and E. Bair, 1985. Weather of U.S. Cities, Vol. 1 Gale Research Co., Detroit, Michigan.

Ruffner, J.A., 1985. Climates of the States, Vol. 1, Gale Research Co., Detroit, Michigan.

U.S. Geological Survey, 1976. 7.5-minute Topographical Series: Rockford North Quadrangle.

ATTACHMENT A

EPA PRELIMINARY ASSESSMENT FORM 2070-12

EPA

POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 1 - SITE INFORMATION AND ASSESSMENT

I. IDENTIFICATION

01 STATE	02 SITE NUMBER
IL	ILD 000 806 190

II. SITE NAME AND LOCATION

01 SITE NAME (Legal, common, or descriptive name of site)	02 STREET, ROUTE NO., OR SPECIFIC LOCATION IDENTIFIER				
Amerock Corporation, a subsidiary of the Newell Group	416 South Main Street				
03 CITY	**04 STATE**	**05 ZIP CODE**	**06 COUNTY**	**07 COUNTY CODE**	**08 CONG DIST**
Rockford	IL	61101	Winnebago		

09 COORDINATES: LATITUDE 42 16 06.N | LONGITUDE 089 08 40.W

10 DIRECTIONS TO SITE *(Starting from nearest public road)*

Take I-90 west exit at Business 20 going west to Main Street, go south on Main Street; facility will be on the east side of the street.

III. RESPONSIBLE PARTIES

01 OWNER *(If known)*	02 STREET *(Business, mailing residential)*		
Amerock Corporation, a subsidiary of the Newell Group	4000 Auburn Street		
03 CITY	**04 STATE**	**05 ZIP CODE**	**06 TELEPHONE NUMBER**
Rockford	IL	61125	(815) 963-9631
07 OPERATOR *(If known and different from owner)*	**08 STREET *(Business, mailing, residential)***		
Amerock Corporation	416 South Main Street		
09 CITY	**10 STATE**	**11 ZIP CODE**	**12 TELEPHONE NUMBER**
Rockford	IL	61101	(815) 963-9631

13 TYPE OF OWNERSHIP *(Check one)*

■ A. PRIVATE ☐ B. FEDERAL: _____ *(Agency name)* ☐ C. STATE ☐ D. COUNTY ☐ E. MUNICIPAL

☐ F. OTHER _____ *(Specify)* ☐ G. UNKNOWN

14 OWNER/OPERATOR NOTIFICATION ON FILE *(Check all that apply)*

■ A. RCRA 3010 DATE RECEIVED: 08 / 12 / 80 (MONTH DAY YEAR) ☐ B. UNCONTROLLED WASTE SITE *(CERCLA 103 c)* DATE RECEIVED: / / (MONTH DAY YEAR) ☐ C. NONE

IV. CHARACTERIZATION OF POTENTIAL HAZARD

01 ON SITE INSPECTION

■ YES DATE 12 / 17 / 91
☐ NO

BY *(Check all that apply)*

☐ A. EPA ■ B. EPA CONTRACTOR ☐ C. STATE ☐ D. OTHER CONTRACTOR
☐ E. LOCAL HEALTH OFFICIAL ☐ F. OTHER: _____ *(Specify)*

CONTRACTOR NAME(S): Resource Applications, Inc.

02 SITE STATUS *(Check one)*

■ A. ACTIVE ☐ B. INACTIVE ☐ C. UNKNOWN

03 YEARS OF OPERATION

1929 (BEGINNING YEAR) | Present (ENDING YEAR) ☐ UNKNOWN

04 DESCRIPTION OF SUBSTANCES POSSIBLY PRESENT, KNOWN, OR ALLEGED

Hazardous wastes generated by Amerock include waste chromate and methyl ethyl ketone. Other wastes at the site include: spent batteries, waste oil, ash, and peel-off paint.

05 DESCRIPTION OF POTENTIAL HAZARD TO ENVIRONMENT AND/OR POPULATION

None identified.

V. PRIORITY ASSESSMENT

01 PRIORITY FOR INSPECTION *(Check one. If high or medium is checked, complete Part 2 - Waste Information and Part 3 - Description of Hazardous Conditions and Incidents.)*

☐ A. HIGH *(Inspection required promptly)* ☐ B. MEDIUM *(Inspection required)* ■ C. LOW *(Inspect on time-available basis)* ☐ D. NONE *(No further action needed; complete current disposition form)*

VI. INFORMATION AVAILABLE FROM

01 CONTACT	02 OF *(Agency/Organization)*			03 TELEPHONE NUMBER
Kevin Pierard	EPA Region 5			(312) 886-4448
04 PERSON RESPONSIBLE FOR ASSESSMENT	**05 AGENCY**	**06 ORGANIZATION**	**07 TELEPHONE NUMBER**	**08 DATE**
Laura Czajkowski	U.S. EPA	Resource Applications, Inc.	(312) 332-2230	12 / 14 / 91 (MONTH DAY YEAR)

EPA

POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 2 - WASTE INFORMATION

I. IDENTIFICATION	
01 STATE	02 SITE NUMBER
IL	ILD 000 806 190

II. WASTE STATES, QUANTITIES, AND CHARACTERISTICS

01 PHYSICAL STATES *(Check all that apply)*

- ☒ A. SOLID
- ☐ B. POWDER, FINES
- ☒ C. SLUDGE
- ☐ D. OTHER _____ *(Specify)*
- ☐ E. SLURRY
- ☒ F. LIQUID
- ☐ G. GAS

02 WASTE QUANTITY AT SITE
(Measures of waste quantities must be independent)

TON _____

CUBIC YARDS 15

NO. OF DRUMS Unknown

03 WASTE CHARACTERISTICS *(Check all that apply)*

- ☐ A. TOXIC
- ☒ B. CORROSIVE
- ☐ C. RADIOACTIVE
- ☐ D. PERSISTENT
- ☐ E. SOLUBLE
- ☐ F. INFECTIOUS
- ☒ G. FLAMMABLE
- ☐ H. IGNITABLE
- ☐ I. HIGHLY VOLATILE
- ☐ J. EXPLOSIVE
- ☐ K. REACTIVE
- ☐ L. INCOMPATIBLE
- ☐ M. NOT APPLICABLE

III. WASTE TYPE

CATEGORY	SUBSTANCE NAME	01 GROSS AMOUNT	02 UNIT OF MEASURE	03 COMMENTS
SLU	SLUDGE	20-25	gallons	
OLW	OILY WASTE	270	gallons	
SOL	SOLVENTS	400	gallons	
PSD	PESTICIDES			
OCC	OTHER ORGANIC CHEMICALS	15	cubic yards	
IOC	INORGANIC CHEMICALS	1,045	gallons	
ACD	ACIDS			
BAS	BASES			
MES	HEAVY METALS			

IV. HAZARDOUS SUBSTANCES *(See Appendix for most frequently cited CAS Numbers)*

01 CATEGORY	02 SUBSTANCE NAME	03 CAS NUMBER	04 STORAGE/DISPOSAL METHOD	05 CONCENTRATION	06 MEASURE OF CONCENTRATION
	Chromate Waste	7440-47-32	Drums		
	Methyl Ethyl Ketone	78-93-3	Drums		

V. FEEDSTOCKS *(See Appendix for CAS Numbers)*

CATEGORY	01 FEEDSTOCK NAME	02 CAS NUMBER	CATEGORY	01 FEEDSTOCK NAME	02 CAS NUMBER
FDS			FDS		
FDS			FDS		
FDS			FDS		
FDS			FDS		

VI. SOURCES OF INFORMATION *(Cite specific references; e.g., state files, sample analysis, reports)*

U.S. EPA Region 5 and Illinois Environmental Protection Agency Files.

EPA

POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 3 - DESCRIPTION OF HAZARDOUS CONDITIONS AND INCIDENTS

I. IDENTIFICATION	
01 STATE	02 SITE NUMBER
IL	ILD 000 806 190

II. HAZARDOUS CONDITIONS AND INCIDENTS

01 ☐ A. GROUNDWATER CONTAMINATION — 02 ☐ OBSERVED (DATE: _____) — ☐ POTENTIAL — ☐ ALLEGED

03 POPULATION POTENTIALLY AFFECTED: _____

04 NARRATIVE DESCRIPTION

None identified. Wastes are stored in closed drums.

01 ☐ B. SURFACE WATER CONTAMINATION — 02 ☐ OBSERVED (DATE: _____) — ☐ POTENTIAL — ☐ ALLEGED

03 POPULATION POTENTIALLY AFFECTED: _____

04 NARRATIVE DESCRIPTION

None identified.

01 ☐ C. CONTAMINATION OF AIR — 02 ☐ OBSERVED (DATE: ___) — ☐ POTENTIAL — ☐ ALLEGED

03 POPULATION POTENTIALLY AFFECTED: _

04 NARRATIVE DESCRIPTION

None identified. Wastes are stored in closed drums.

01 ☐ D. FIRE/EXPLOSIVE CONDITIONS — 02 ☐ OBSERVED (DATE: _____) — ☐ POTENTIAL — ☐ ALLEGED

03 POPULATION POTENTIALLY AFFECTED: _____

04 NARRATIVE DESCRIPTION

None identified.

01 ☐ E. DIRECT CONTACT — 02 ☐ OBSERVED (DATE: _____) — ☐ POTENTIAL — ☐ ALLEGED

03 POPULATION POTENTIALLY AFFECTED: _____

04 NARRATIVE DESCRIPTION

None identified.

01 ☐ F. CONTAMINATION OF SOIL — 02 ☐ OBSERVED (DATE: _____) — ☐ POTENTIAL — ☐ ALLEGED

03 AREA POTENTIALLY AFFECTED: _____ *(Acres)*

04 NARRATIVE DESCRIPTION

None identified.

01 ☐ G. DRINKING WATER CONTAMINATION — 02 ☐ OBSERVED (DATE: _____) — ☐ POTENTIAL — ☐ ALLEGED

03 POPULATION POTENTIALLY AFFECTED: _____

04 NARRATIVE DESCRIPTION

There is no evidence of drinking water contamination.

01 ☐ H. WORKER EXPOSURE/INJURY — 02 ☐ OBSERVED (DATE: _____) — ☐ POTENTIAL — ☐ ALLEGED

03 WORKERS POTENTIALLY AFFECTED: _____

04 NARRATIVE DESCRIPTION

None identified.

01 ☐ I. POPULATION EXPOSURE/INJURY — 02 ☐ OBSERVED (DATE: _____) — ☐ POTENTIAL — ☐ ALLEGED

03 POPULATION POTENTIALLY AFFECTED: _____

04 NARRATIVE DESCRIPTION

There is no evidence of any population exposure/injury. The facility is locked and has a 24-hour guard security.

EPA

POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 3 - DESCRIPTION OF HAZARDOUS CONDITIONS AND INCIDENTS

I. IDENTIFICATION	
01 STATE	02 SITE NUMBER
IL	ILD 000 806 190

II. HAZARDOUS CONDITIONS AND INCIDENTS (Continued)

01 ☐ J. DAMAGE TO FLORA — 02 ☐ OBSERVED (DATE: _____) — ☐ POTENTIAL — ☐ ALLEGED

04 NARRATIVE DESCRIPTION

None identified.

01 ☐ K. DAMAGE TO FAUNA — 02 ☐ OBSERVED (DATE: _____) — ☐ POTENTIAL — ☐ ALLEGED

04 NARRATIVE DESCRIPTION (Include name(s) of species)

None identified.

01 ☐ L. CONTAMINATION OF FOOD CHAIN — 02 ☐ OBSERVED (DATE: _____) — ☐ POTENTIAL — ☐ ALLEGED

04 NARRATIVE DESCRIPTION

None identified.

01 ☐ M. UNSTABLE CONTAINMENT OF WASTES — 02 ☐ OBSERVED (DATE: _____) — ☐ POTENTIAL — ☐ ALLEGED

03 POPULATION POTENTIALLY AFFECTED: _____ — 04 NARRATIVE DESCRIPTION

None identified.

01 ☐ N. DAMAGE TO OFF-SITE PROPERTY — 02 ☐ OBSERVED (DATE: _____) — ☐ POTENTIAL — ☐ ALLEGED

04 NARRATIVE DESCRIPTION

None identified.

01 ☐ O. CONTAMINATION OF SEWERS, STORM DRAINS, WWTPS — ☐ OBSERVED (DATE: _____) — ☐ POTENTIAL — ☐ ALLEGED

04 NARRATIVE DESCRIPTION

None identified.

01 ☐ P. ILLEGAL/UNAUTHORIZED DUMPING — 02 ☐ OBSERVED (DATE: _____) — ☐ POTENTIAL — ☐ ALLEGED

04 NARRATIVE DESCRIPTION

None identified.

05 DESCRIPTION OF ANY OTHER KNOWN, POTENTIAL, OR ALLEGED HAZARDS

None identified.

III. TOTAL POPULATION POTENTIALLY AFFECTED: __

IV. COMMENTS

None.

V. SOURCES OF INFORMATION *(Cite specific references; e.g., state files, sample analysis, reports)*

U.S. EPA Region 5 files, Illinois Environmental Protection Agency files.

ATTACHMENT B

VISUAL SITE INSPECTION SUMMARY AND PHOTOGRAPHS

VISUAL SITE INSPECTION SUMMARY

Amerock Corporation
Rockford, Illinois
ILD 000 806 190

Date:	December 17, 1991
Facility Representatives:	Phil Bell, Environmental Engineer Larry Swacina, Manager - Environmental Compliance and Protection
Inspection Team:	Mike Gorman, Resource Applications, Inc. (RAI) Laura Czajowski, RAI
Photographer:	Laura Czajowski, RAI
Weather Conditions:	Windy, overcast, temperature about 50°F.
Summary of Activities:	The visual site inspection (VSI) began at 9:15 a.m. with an introductory meeting. The inspection team discussed the purpose of the VSI and the agenda for the visit. Facility representatives then discussed Amerock's past and current operations, solid wastes generated, and release history. Most of the information was exchanged on a question-and-answer basis. Amerock representatives provided the inspection team with copies of documents requested. The VSI tour began at 11:10 a.m. The tour started on the sixth floor of the building. The second and the first floor were toured next. We then went outside to see how far the Rock River was from the facility. The tour concluded at 12:35 p.m., after which, the inspection team held an exit meeting with Phil Bell. The VSI was completed and the inspection team left the facility at 1:45 p.m.

Photograph No. 1 Location: SWMU 1
Orientation: Southwest Date: 12/17/91
Description: This is the electrostatic paint spray booth where waste MEK (F005) is accumulated in a 5-gallon pan. This is on the sixth floor.

Photograph No. 2 Location: SWMU 1 and 4
Orientation: South Date: 12/17/91
Description: On the left is the accumulation of hazardous chromate waste. The two drums on the right are nonhazardous phosphate and cleaner waste.

Photograph No. 3 Location: SWMU 4
Orientation: South Date: 12/17/91
Description: This is the burn-off oven where ash is accumulated.

Photograph No. 4 Location: SWMU 8
Orientation: North Date: 12/17/91
Description: This is a RCRA-closed drum storage area. It currently stores empty drums and rolls of paper.

Photograph No. 5 Location: SWMU 7
Orientation: North Date: 12/17/91
Description: This is a RCRA-closed drum storage area.

Photograph No. 6 Location: SWMU 5
Orientation: West Date: 12/17/91
Description: This is the Hazardous Waste Container Storage Area. It also stores product paint.

Photograph No. 7 Location: SWMU 2
Orientation: South Date: 12/17/91
Description: These are drums of parts coating waste. They are manifested out as special waste.

Photograph No. 8 Location: SWMU 6
Orientation: West Date: 12/17/91
Description: These are spent batteries that are to be picked up or recharged. This is located on the first floor.

Photograph No. 9
Orientation: Southeast
Description: This is where waste oil is accumulated.

Location: SWMU 3
Date: 12/17/91

Photograph No. 10
Orientation: Northwest
Description: These are five full waste oil drums waiting to be shipped out. This is located on the second floor.

Location: SWMU 3
Date: 12/17/91

ATTACHMENT C

VISUAL SITE INSPECTION FIELD NOTES

AMEROCK

30°F, overcast
9:15 am. met with Phil Ball, Env. engineer
Larry Swacina, Env. Comp. & protect.
Main Street facility began in 1929 -
hardware plant that occupied 1 floor
in a 13 story building.
in the 1960's owned all 13 stories.
used to do:
Stamping steel parts
molding
zinc die casting parts
degreasing - TCA
painting
lacquering
moved some operations over to the 4000 Auburn
plant - specifically
Stamping steel parts
molding
zinc die casting parts
small operation of assembly - thread parts
and screw it together.

Hazardous operations are the painting
6th floor - former drum storage areas

JC 12/17/91 142

AMEROCK

Employs 350 people - 3 shifts
6 days a week
potential receptors
plant 2 blocks away from the
Rock River.
2 entrances to building -
office entry
building entry
locked building use key cards for
access.
24 hour guard security
3 operations at plant
1. ASSEMBLY
2. Painting
3. Storage

JC 12/17/91 143

AMEROCK

pretreatment painting
↓
phosphate
chromate
baths
↓
spray wash
↓
dry off
ovens
↓
electro static
booths (2)
↓
bake off oven
↓
burn off
unit → Ash special waste

JC 12/17/91 144

AMEROCK

Amerock purchased by Newell in 1987
Same process but altered a little—
Brass
Steel
Zinc

No releases or spills on site.
No wastewater treatment system.
Water monitored by Rockford Sanitary District
Amerock monitors water daily for: zinc
chrome
No wells on property
get their water from Rockford City
No landfills or lagoons on site
Waste oil - 2nd floor
3 container storage areas
1 in use
Waste oil - 2nd floor
Waste from incinerator

JC 12/17/91 145

AMEROCK

base dimension of building
1 block by 1 block
155 ft by 155 ft

* Could you send us a copy of permit and notification

phosphate process > corrosion resistance
Chromate

Electro Static Spray Booths -
55-gallon drums to pump - parts on rack
overspray on filters - special wastes.
passed TCLP testing - Exhaust ventilation pulls paint into filters

Occassional drum of MEK - hazardous
stored on 6th floor in storage area
used to clean the dishes in
Spray booths

Sodium hydroxide Cleaner pH 11
Sprayed on parts on conveyor

Cleaner solids - Chem Waste Management
of Alsip, ILLINOIS

LC 12/17/91 146

AMEROCK

Chromate solid - ChemWaste Management
Chromate liquid - FLW GSX LADLOW ENVIRON
Brought to Auburn facility
for treatment.

Chromate liquid
1990 - 1,045 gallons
1989 - 55 gallons

paint spray parts - filters collect
residual paint
transported by PDC - peoria disposal Co.
Disposed by
goes to Clinton Landfill
1991 - 15 cubic yards
1990 - 3,850 gallons PDC
1989 - 5,060 gallons PDC

Commercial product paint - stored in 55 gal
drums
1 receiving dock - take it to the 6th floor
Stores both waste + product

hydraulic oils - used for different
assembly machines
riveting

LC 12/17/91 147

AMEROCK

Waste oil generation rates -

1989 - NONE
1990 - 270 gallons
1991 - NONE

Commercial battery storage on 1st floor used for lift trucks

Oil for routine maintenance goes out with other waste oil.

Naptha - stoddard solvents for parts cleaning 140°F.P.

lacquering process on Brass

Other zinc, steel > paint instead of lacquering

Burn off oven - over spray on hooks of racks - remove racks onto skids take to burn off oven - 1450°F powder drops down into trough powder shoveled into drums

~~Considered hazardous sprayed waste~~

parts coating waste + incineration waste > Clinton Landfill

12/17/91 148

AMEROCK

introductory conference ended 10:55 am

population of Rockford 140,000

11:10 am VSI TOUR BEGAN

Phil Bell
Fred Saur
Chuck Meyer
Dave Beale
> AMEROCK

Stoddard solvents 2 foot by 3 foot pan - closed area

MAINTENANCE

1st floor - batteries, stoddard solvents
2nd floor -
6th floor - former drum storage areas

No floor drains in building

PHOTOS

6th floor

① Southwest paint spray booth solvent plastic tray

12/17/91 149

AMEROCK

② North
phosphate tank
secondary containment

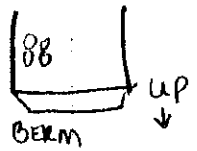
③ South Chromate Waste
2 drums 2 drums Caustic

④ North triangular 501 Storage unit
that was closed

⑤ North former Storage Area
6x12

⑥ West Hazardous Waste Drum Storage Area
staining on floor
Berm to prevent spill from
leaving area

⑦ burn-off oven South
Ash Collection



⑧ North
⑨ Paint Booth Scrap
Berm sloping to South
Peel off paint

JC 12/17/91 150

AMEROCK

1st Floor

⑩ West Batteries waiting to be
recharged or traded in for new
ones. 2 per year
wood block floor coated w/ Creosol

⑪ West Machine Parts Cleaner

2nd floor

⑫ Southeast 21x26 ft
Accumulating waste oil
3 drums open
pool of oil in middle of floor

⑬ 5 full ones Northwest
cement floor

12:35 tour ended
went back to
Auburn St facility
for exit meeting

JC 12/17/91 151

AMEROCK

N - Downtown Commercial
E - Rock River
S - Commercial
W - Commercial / Residential

Chromic acid - (D002/D007)
phosphuric acid - (D002)

two areas went through closure
1st 28 ft x 12 ft - D002, D007 1987-89

2nd - 12 ft x 36 ft D002 spent alkaline cleaner
F005 waste paint thinner
toluene, MEK

3rd - former storage area
12 ft x 6 ft
NPDES PERMIT is for storm run-off from
roof of building

12/17/91 152

CERTIFICATION REGARDING POTENTIAL RELEASES FROM
SOLID WASTE MANAGEMENT UNITS

FACILITY NAME: Amerock Corporation

EPA I.D. NUMBER: ILD000806190

LOCATION CITY: 416 South Main Street, Rockford,

STATE: Illinois 61101

1. Are there any of the following solid waste management units (existing or closed) at your facility? NOTE - DO NOT INCLUDE HAZARDOUS WASTE UNITS CURRENTLY SHOWN IN YOUR PART A APPLICATION

	YES	NO
° Landfill		X
° Surface Impoundment		X
° Land Farm		X
° Waste Pile		X
° Incinerator		X
° Storage Tank (Above Ground)		X
° Storage Tank (Underground)		X
° Container Storage Area		X
° Injection Wells		X
° Wastewater Treatment Units		X
° Transfer Stations		X
° Waste Recycling Operations		X
° Waste Treatment, Detoxification		X
° Other _____		

2. If there are "Yes" answers to any of the items in Number 1 above, please provide a description of the wastes that were stored, treated or disposed of in each unit. In particular, please focus on whether or not the wastes would be considered as hazardous wastes or hazardous constituents under RCRA. Also include any available data on quantities or volume of wastes disposed of and the dates of disposal. Please also provide a description of each unit and include capacity, dimensions and location at facility. Provide a site plan if available.

None

NOTE: Hazardous wastes are those identified in 40 CFR 261. Hazardous constituents are those listed in Appendix VIII of 40 CFR Part 261.

3. For the units noted in Number 1 above and also those hazardous waste units in your Part A application, please describe for each unit any data available on any prior or current releases of hazardous wastes or constituents to the environment that may have occurred in the past or may still be occurring.

   Please provide the following information

   a. Date of release
   b. Type of waste released
   c. Quantity or volume of waste released
   d. Describe nature of release (i.e., spill, overflow, ruptured pipe or tank, etc.)

   To the best of our knowledge, no prior or current releases of hazardous wastes or constituents to the environment has or is occurring.

4. In regard to the prior or continuing releases described in Number 3 above, please provide (for each unit) any analytical data that may be available which would describe the nature and extent of environmental contamination that exists as a result of such releases. Please focus on concentrations of hazardous wastes or constituents present in contaminated soil or groundwater.

   None

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the submittal is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations. (42 U.S.C. 6902 et seq. and 40 CFR 270.11(d))

Ronald K. Entrikin, Vice-President - Manufacturing
Typed Name and Title

Ronald K. Entrikin
Signature

3-18-86
Date

F.1 Imagery/Special Studies

EPA REGION 5 PRINTING REQUEST FORM

Name Arthur N. Lubin Mail Code LPGJ

Phone Number 6-6226 Division LEN

Are these sensitive documents requiring control

Yes____ No X

Number of original sheets _____

Number of copies requested _____

Output 2-sided_____ Single sided _____

Number of boxes _____

Date Submitted _____ Work needed _____

Collated Y or N _____ Staple Y or N _____

Please select the following paper size

Standard _____ Legal _____ 11x17" _____

Special instructions: paper color, pick-up or drop off service, special handling instructions.

Please scan

Please note: We are not allowed to make copies of copy written materials without permission from the originator. Please check to make sure your documents are not under copy written protection.

OPERATOR NAME 2-18-15 Craig

TIME STARTED 10:25AM

TIME COMPLETED 11:00AM

TOTAL TIME 35MIN